CERCLA SECTION 103 and EPCRA SECTIONS 302 - 312 INSPECTION REPORT

I. FACILITY Dominion Cove Point LNG, LP

2100 Cove Point Road Lusby, Maryland 20657

CONTACT Mr. Paul Dickson

TELEPHONE NO. (410) 286-5136

EMAIL ADDRESS paul.e.dickson@dom.com

SIC Code: <u>4922</u> NAICS Code: 486210

II. DATE OF INSPECTION June 3, 2013

III. INSPECTORS Mr. Jeffrey Thomas, Chenega Global Services, LLC

Ms. Kristie DePiero, Chenega Global Services, LLC

SERC REPRESENTATIVE Ms. Tammy Roberson, Environmental Compliance

Specialist, Maryland Department of the

Environment

LEPC REPRESENTATIVE Mr. Robert Fenwick, Division Chief of Emergency

Management, Calvert County LEPC

IV. FACILITY REPRESENTATIVES Mr. Paul Dickson, Environmental Consultant

Mr. Michael Gardner, Manager LNG Operations

V. PURPOSE OF INSPECTION CERCLA Section 103 and EPCRA Sections 302-312

Inspection

VI. OPENING CONFERENCE

1. OPENING CONFERENCE AND GENERAL INSPECTION PROCEDURES

The U.S. Environmental Protection Agency (EPA) selected the Dominion Cove Point LNG, LP (Dominion) facility for an inspection based on information received by the Region 3 Emergency Planning and Community Right-to-Know Act (EPCRA) Coordinators, Mr. Perry Pandya and Ms. Anne Gilley, regarding a continuous release that occurred at the Dominion facility located at 2100 Cove Point Road in Lusby, Maryland. According to National Response Center (NRC) Incident Report No. 1038884 (Attachment 7), the Dominion facility in Lusby, Maryland reported an initial notification of a continuous release of ammonium hydroxide that was discovered at 3:34 p.m. (1534 hours) on February 19, 2013 and was reported to the NRC at 3:37 p.m. (1537 hours) on February 19, 2013, a delay of approximately three (3) minutes. However, the facility indicated that the continuous release was actually anhydrous ammonia. Additionally, the NRC Report indicated that one hundred sixty-one and eight tenths (161.8) pounds, two hundred eighty-five and one tenths (285.1) pounds, and one hundred thirty-five (135) pounds of ammonia was released from three (3) Selective Catalytic Reduction (SCR) systems. An update notification was initiated by the NRC on March 4, 2013. The March 4, 2013 NRC Report Number 1040001 contained the same information as the initial NRC Report.

Anhydrous ammonia [Chemical Abstracts Service (CAS) Number 7664-41-7] is an EPCRA Extremely Hazardous Substance (EHS) and a Comprehensive Environmental Response,

Compensation, and Liability Act (CERCLA) hazardous substance with a Reportable Quantity (RQ) of one hundred (100) pounds. Consequently, the Dominion facility was selected for an EPCRA Sections 302 through 312 and CERCLA Section 103 inspection.

On May 16, 2013, Mr. Jeffrey Thomas of Chenega Global Services, LLC (CGS) contacted the listed telephone number of the Dominion facility and was directed to Mr. Paul Dickson, Dominion Environmental Consultant (Attachment 9). Mr. Thomas (CGS) stated that he was attempting to schedule a CERCLA Section 103 and EPCRA Sections 302, 303, 304, 311, and 312 inspection at the Dominion facility located in Lusby, Maryland regarding a reported continuous release of ammonia that was discovered on February 19, 2013. Mr. Dickson (Dominion) and Mr. Thomas (CGS) agreed that the inspection would be conducted on June 3, 2013 at 9:30 a.m. (0930 hours). On May 22, 2013, Mr. Kevin Daniel, Acting Oil and Prevention Branch Chief, EPA Region 3, sent a letter to Mr. Dickson (Dominion) confirming the date and time of this inspection (Attachment 10).

The following table summarizes the date and contact information pertaining to the Certified Statements sent by Mr. Thomas (CGS) requesting the EPCRA reporting status of the Dominion facility for reporting years 2010, 2011, and 2012:

Date	Contact Name	Agency	
5/17/13	Ms. Patricia Williams	Maryland Department of the Environment	SERC
5/17/13	Mr. Robert Fenwick	Calvert County LEPC	LEPC
5/17/13	Mr. James Richardson	Calvert County Fire Department	Local Fire Department

On June 3, 2013, the inspectors, Mr. Thomas (CGS) and Ms. Kristie DePiero (CGS), met with Mr. Dickson (Dominion) and Mr. Michael Gardner, Dominion Manager of LNG Operations, at the Dominion facility located at 2100 Cove Point Road in Lusby, Maryland to conduct the CERCLA Section 103 and EPCRA Sections 302 through 312 inspection. Also in attendance at the inspection was a representative for the Maryland Department of the Environment (MDE), Ms. Tammy Roberson, Environmental Compliance Specialist, and Mr. Robert Fenwick, Division Chief of Emergency Management with the Calvert County Local Emergency Planning Committee (LEPC).

Mr. Thomas (CGS) read a statement explaining the purpose and potential activities of the CERCLA and EPCRA inspection of the facility. The statement read is provided below:

The United States Environmental Protection Agency, it employees, agents, contractors and authorized representatives, are present for the purpose of conducting an inspection at the Dominion Cove Point LNG, LP facility to evaluate the Facility's compliance with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9603, and Sections 302, 303, 304, 311, and 312 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 11002, 11003, 11004, 11021, and 11022. Your consent is requested for entry to the Facility property, including any and all buildings and structures located on the property where entry is needed to complete the Inspection, to make visual observations, examine equipment, take still photographs; take video (including sound); inspection and copy documents and conduct other activities necessary to complete the Inspection.

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Mr. Dickson (Dominion) stated that he was authorized on behalf of the Dominion facility to approve facility access to the inspectors to perform the described inspection, and also stated that he consented to the inspectors' entry to the facility to perform the inspection as described by Mr. Thomas (CGS).

The inspectors' credentials were presented and a Notice of Inspection was presented and explained (Attachment 1). Mr. Dickson (Dominion) signed the notice, and an outline of the areas to be investigated was discussed. Mr. Thomas (CGS) informed the facility representatives that the inspectors would be recording all documents provided to the inspectors by Dominion representatives on the Receipt for Samples and Documents (Attachment 2). A Meeting Sign-In Sheet was also completed by the meeting attendees and is included as Attachment 3.

During the opening conference, the inspectors advised the company representatives of the procedures necessary for asserting a confidentiality claim in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Part 2, Subpart B. The inspectors advised the company representatives that a written request in accordance with 40 CFR Part 2, Subpart B, must be sent to the EPA Region 3 EPCRA Work Coordinator, Mr. Perry Pandya, to assert a formal confidentiality claim. At the time of the inspection, the Dominion representatives stated that they would not be asserting a confidentiality claim.

Location and topographic maps of the facility were prepared by the inspectors and are included as Attachment 4. Mr. Thomas (CGS) informed the facility representatives that the inspectors would be photo-documenting the tour of the facility. Refer to Attachment 5 for the Photograph Log. Mr. Thomas (CGS) reviewed with facility representatives the regulatory guidance pertaining to Section 103 of CERCLA and Sections 302, 303, 304, 311, and 312 of EPCRA (Attachment 6).

SERC: Maryland Department of the Environment (MDE)

1800 Washington Boulevard, Suite 540

Baltimore, Maryland 21230 Telephone: (410) 537-3800 Facsimile: (410) 537-3873

LEPC: Calvert County LEPC

c/o Calvert County Emergency Management Division

175 Main Street, Courthouse Prince Frederick, MD 20678 Telephone: (410) 535-1600 Facsimile: (410) 535-3997

Local Fire Department:

Calvert County Fire Departments 175 Main Street, Courthouse Prince Frederick, MD 20678 Telephone: (410) 535-1600 Facsimile: (443) 486-4074

2. FACILITY DESCRIPTION, OPERATIONS, AND CORPORATE INFORMATION

The facility description, operations, and corporate information provided below are based on information gathered during and after the inspection and include the following:

• Dominion Cove Point LNG, LP Company Information (Attachment 11),

- Dominion Cove Point LNG, LP Corporate Hierarchy (Attachment 12),
- Facility Acreage Summary (Attachment 13), and
- Facility Map (Attachment 14).

The Dominion facility in Lusby, Maryland is a storage and transportation terminal for Liquefied Natural Gas (LNG). The facility receives LNG from tanker ships at a pier located one (1) mile offshore in the Chesapeake Bay. The facility transfers the LNG to onsite aboveground storage tanks. The facility then converts the LNG to its gaseous form and transfers the product into a natural gas pipeline for distribution offsite. During the inspection the facility was only able to import and distribute LNG from tanker ships. However, Dominion is planning to modify the current facility to receive natural gas and liquefy it for export. The Dominion facility is manned twenty-four (24) hours a day and seven (7) days a week and employs ninety-eight (98) persons. The Dominion facility does not have any tenants.

Dominion Cove Point LNG, LP is operated by a general partner Dominion LNG Company, LLC. Dominion LNG Company, LLC is a subsidiary of Dominion Cove Point, Inc., which in turn is a subsidiary of Dominion Resources, Inc. (Attachment 12). Dominion Cove Pint LNG, LP is headquartered at the Lusby, Maryland facility location and the ultimate global parent Dominion Resources, Inc. is headquartered at 120 Tredegar Street in Richmond, Virginia. Dominion Cove Point LNG, LP was organized as a Delaware limited partnership entity in 1993. Dominion Resources, Inc. began operation in 1978 and was incorporated in the Commonwealth of Virginia in 1983. The Dominion facility in Lusby, Maryland had 2012 revenues of approximately two hundred eighty-one million five hundred thousand (281,500,000) dollars.

The Dominion facility is located on one thousand seventeen and ninety-one hundredths (1,017.91) acres of land owned by Dominion. The industrial facility acreage within the fence line is one hundred thirty and thirteen hundredths (130.13) acres (Attachment 13). Dominion representatives provided the inspectors with a property map (Attachment 14). The facility is mainly surrounded on all sides by undeveloped land with the town of Lusby, Maryland to the south and the Chesapeake Bay to the east. The facility does not have any rail lines entering the property.

The Dominion facility operates under an air permit. Since the continuous release of ammonia was not regulated under the permit, the inspectors did not request a copy of the air permit. The facility also operates under a National Pollution Discharge Elimination System (NPDES) permit; the inspectors did not request a copy of the NPDES permit.

President of Dominion Cove Point LNG
Company LLC:

Senior Vice President of Dominion Cove Point LNG
Company LLC:

Mr. Gary Sypolt
Ms. Diane Leopold

During the inspection, Mr. Dickson (Dominion) stated that the Dominion facility's primary Standard Industrial Classification (SIC) Code is 4922, Natural Gas Transmission. Mr. Dickson (Dominion) also stated that the Dominion facility's primary North American Industrial Classification Standard (NAICS) Code was 486210, Pipeline Transportation of Natural Gas.

The remainder of the inspection focused on collecting specific information regarding the February 19, 2013 ammonia continuous release and determining if the facility had present any Extremely Hazardous Substances (EHSs) or hazardous chemicals above the Threshold Planning Quantities (TPQs) or threshold levels for the applicable calendar years, 2010, 2011, and 2012.

VII. INSPECTION CONFERENCE

1. SECTIONS 302 AND 303 OF EPCRA

Mr. Dickson (Dominion) indicated to the inspectors that the Dominion facility stored one (1) EHS onsite in a quantity greater than its TPQ during calendar years 2010, 2011, and 2012. Mr. Dickson (Dominion) identified the EHS stored onsite as sulfuric acid contained in lead acid batteries. Mr. Dickson (Dominion) provided the inspectors with a letter dated July 10, 2008 submitted to the State Emergency Response Commission (SERC) and LEPC indicating that the facility stored sulfuric acid (Attachment 15). The July 10, 2008 letter also identified the Facility Emergency Coordinator (FEC).

2. SECTION 304 OF EPCRA AND SECTION 103 OF CERCLA

February 19, 2013 Continuous Release of Anhydrous Ammonia

The release information is based on the list of documents provided below and information provided to the inspectors during the inspection:

- December 15, 2012 through February 17, 2013 Ammonia Slip Data Report Summary (Attachment 16),
- Ammonia Slip Calculations (Attachment 17),
- July 15, 2013 Response to an Additional Information Request (Attachment 18),
- February 19, 2013 Initial Continuous Release Notification Report (Attachment 19),
- Continuous Release Initial Notification Notes (Attachment 20),
- Average Stack Flow and Temperatures (Attachment 21),
- Upper Bound Limit Calculation Results Summary (Attachment 22), and
- March 18, 2013 Thirty (30) Day Initial Written Continuous Release Notification Report (Attachment 23).

The Dominion facility utilizes six (6) simple-cycle natural gas turbines for the generation of electricity used at the site. The turbines are not connected to the electrical grid and do not transmit electricity offsite. Each of the six (6) turbines is equipped with a SCR system, which requires an injection of nineteen (19) percent ammonium hydroxide to reduce nitrogen oxide (NOx) emissions. Un-reacted ammonium hydroxide is converted to ammonia within the SCR and is released from the turbine stacks.

The original three (3) turbines were installed in 2002 with the SCR system utilizing urea to reduce NOx emissions. In 2004 the facility transitioned to ammonium hydroxide to reduce NOx emissions. In 2009 the facility instated three (3) more turbines, each with an ammonium hydroxide SCR system. The facility operated the turbines under a Title V Air Permit; however ammonia emissions are not covered under the air permit. According to Mr. Dickson (Dominion), prior to October of 2012 the facility had not conducted calculations to determine if unreacted ammonia was being released through the turbine stacks.

In October of 2012 Mr. Dickson (Dominion) began a self assessment of the facility. Mr. Dickson (Dominion) began overseeing environmental operations at the facility shortly before the self assessment began. As part of the self assessment the facility staff recognized that installed emission control monitors could provide data for the calculation of unreacted ammonia from the

SCRs. The unreacted ammonia emissions were also referred to as ammonia slip. In October of 2012 the facility initiated requests for assistance from the Continuous Emissions Monitoring System (CEMS) vendor to tie in the CEMS monitors to the Data Acquisition and Handling System (DAHS).

On December 2, 2012 the CEMS vendor discovered an ammonia reagent flow rate problem. The signal range of the ammonia reagent flow meter did not match the signal range of the CEMS DAHS logic controller. Because the signal range mismatch causes the DAHS to assign a different ammonia reagent flow value into the ammonia slip equation other than what the flow meter is actually measuring, this resulted in the calculation of an incorrect ammonia slip value.

Between December 9, 2012 and December 13, 2012 the facility's DAHS program vendor verified the ammonia reagent flow signal values and matched the DAHS input signal to the ammonia reagent flow meter output signal and then verified the ammonia slip calculations.

On December 15, 2012 the flow monitor inputs were tied back into the DAHS. The Cove Point staff then began evaluating the precision and accuracy of ammonia slip calculations. Without any physical evidence of an ammonia release by either visual or odor observations, questions remained throughout the ensuing weeks regarding the presence or magnitude of ammonia slip releases and the meaning of the data.

During the period from December 15, 2012 to February 19, 2013, data from the CEMS was available electronically on a daily basis and reviewed at least weekly if not more often. After CEMS data showed numbers above the one hundred (100) pound per day threshold, the facility staff immediately began evaluating the accuracy of the input data for the ammonia slip calculations. As there was no physical evidence that tended to support this initial ammonia slip data, the facility focused on validating the input data.

The first indication that a potential RQ release of ammonia from a SCR was on December 18, 2012 when turbine 111JA reported an ammonia slip of one hundred seven and eight tenths (107.8) pounds per day. Mr. Dickson (Dominion) explained that while an indication of a potential RQ release of ammonia was evident on December 18, 2012, the facility determined that full evaluation of the monitoring system should be conducted to accurately portray the ammonia slip from the SCRs.

On December 30, 2012 a flow span upper range limit in the DAHS ammonia slip calculation was discovered to be limiting the ammonia slip values. The limit in the calculation was removed and the slip numbers were recalculated.

Between January 3, 2013 and February 19, 2013 the Cove Point staff worked with Dominion Virginia Power's Fossil and Hydro Emission Monitoring Support Group (EMSG) to evaluate input data for potential errors. This included review of aqueous ammonia flow, verification of the inlet NOx certification, review of Frame 3 turbines SCR install records, and review of the ammonia calculations.

Mr. Dickson (Dominion) provided the inspectors with the ammonia release data summary report from December 15, 2012 through February 17, 2013 that was used to establish the initial ammonia release rates from the SCRs (Attachment 16).

The formulas used to calculate the ammonia slip were provided during the inspection (Attachment 17) and were expounded upon in the July 15, 2013 response to an additional information request

(Attachment 18). The inputs to the ammonia slip formulas were automatic from the CEMS monitors and the plant distributed control system (DCS). The formula inputs included the following constants; nineteen (19) percent aqueous ammonia, and the standard constants for natural gas combustion. The formula inputs included the following variables; fuel British Thermal Unit (BTU) content, fuel flow rate, catalyst inlet NOx concentration, catalyst outlet NOx concentration, outlet oxygen concentration, and the aqueous ammonia flow rate. Mr. Dickson (Dominion) stated in the July 15, 2013 response to an additional information request, that the facility initially had concerns about the accuracy of some of the variable inputs (Attachment 18).

On the afternoon of February 19, 2013 Mr. Dickson (Dominion) made the decision that a proper evaluation of the ammonia slip calculations were complete and that the facility was periodically releasing ammonia from the SCRs in an amount greater than the RQ of ammonia during a twenty-four (24) hour period. Since the release of ammonia was continuous Mr. Dickson (Dominion) began the process of notification for a continuous release of ammonia.

At 3:34 p.m. (1534 hours) Mr. Dickson (Dominion) contacted the NRC to report the continuous release of ammonia from the turbine SCRs (Attachment 19). Mr. Dickson (Dominion) indicated that three (3) of the six (6) SCRs had ammonia releases greater than one hundred (100) pounds during a twenty-four (24) hours period. The NRC Report number 1038884 was established for the release, which became the Continuous Release – Emergency Response Notification System (CR-ERNS) number for the subject emission facilities.

Mr. Dickson (Dominion) then called the SERC and LEPC immediately after his call to NRC. The times of these calls were not recorded in the notification notes provided to the inspectors (Attachment 20). Mr. Dickson (Dominion) notified the SERC and the LEPC that the facility was continuously releasing ammonia from the SCRs.

At 4:00 p.m. (1600 hours) Mr. Dickson (Dominion) contacted the Maryland Emergency Management Agency (MEMA) and indicated that the facility was continuously releasing ammonia from the SCRs (Attachment 20).

At 4:40 p.m. (1640 hours) a representative from the United States Coast Guard contacted Mr. Dickson (Dominion) to gather additional information about the reported release (Attachment 20).

After the initial continuous release notification the facility used the data gathered in addition to electrical generation data for the calendar year 2012 to develop the upper and lower bounds limit of the release. Ammonia slip formulas were established for the three (3) GE Frame 3 turbines, the two (2) GE Frame 5 turbines, and the Solar Turbine (Attachments 17 and 18). Additionally the average stack flow and temperature was established for each turbine (Attachment 21). The results of the calculations provided the facility with the maximum, median, mode, and average ammonia slip release rates in pounds per day (Attachment 22).

The lower limit bound was determined to be zero (0) if no turbines were active. The upper limit boundary for each turbine was calculated using the 2012 calendar year hourly average data from the facility's software data historian. Daily and maximum ammonia slip values were then calculated in Excel using the established DAHS ammonia slip formulas. The upper bound limit was determined to be the total ammonia slip rate from the four (4) highest turbine maximum upper bound limits. The upper bound limit and Statistical Significant Increase (SSI) was established as one thousand ninety-nine (1,099) pounds. Mr. Dickson (Dominion) indicated that only four (4) turbine emissions were used in the upper bound limit due to the maximum energy needs for the facility which would not need to activate more than four (4) turbines.

On March 18, 2013, Mr. Dickson (Dominion) submitted the thirty (30) day Initial Written Continuous Release Notification Report to EPA Region 3, the SERC, and the LEPC (Attachment 23). The Initial Written Continuous Release Notification Report provided the information required pursuant to continuous release reporting requirements.

Plant representatives stated that since the calendar year 2009 there have been no equipment upgrades or additions to the facility plant power generation processes.

Mr. Dickson (Dominion) stated that since recognizing that the facility was continuously releasing ammonia, he has been working with facility operational staff to better regulate the amount of ammonium hydroxide used for NOx reduction. Mr. Dickson (Dominion) believed that the regulation of the ammonium hydroxide would show lower ammonia release emissions and change the upper bound limit on the One (1) Year Anniversary Written Continuous Release Notification Report.

The inspectors requested information regarding whether Dominion Resources, Inc. (or a subsidiary) operated facilities in EPA Region 3 that reported a continuous release of ammonia from a NOx reduction source. According to Mr. Dickson's (Dominion) July 15, 2013 response to an additional information request, Dominion Virginia Power had four (4) facilities that provided initial notifications for continuous releases of ammonia from NOx control SCRs in 2004. The facility, release facility, CR-ERNS Numbers, and date of the initial continuous release notification are provided below (Attachment 18):

- Mt. Storm Power Station (WV), Units 1, 2, 3; CR-ERNS No. 625548, June 17, 2004
- Chesapeake Energy Center (VA), Units 1, 2, 3, 4; CR-ERNS No. 625614, June 17, 2004
- Clover Power Station (VA), Units 1, 2; CR-ERNS No. 725418, June 18, 2004
- Possum Point Power Station (VA), Units 6A, 6B, CR-ERNS No. 625594, July 15, 2004

Additionally, Mr. Dickson (Dominion) indicated that in 2005, annual follow up reports were submitted for the Chesapeake Energy Center and the Possum Point Power Station. Dominion Virginia Power withdrew its continuous release reports for Mt. Storm Power Station and Clover Power Station because it was later determined that wet scrubbers used for sulfur dioxide control at these facilities absorbed ammonia such that slip emissions were deemed well below the one hundred (100) pound reporting threshold. Ammonia captured by the scrubbers is eventually discharged pursuant to Mt. Storm Power Station's and Clover Power Station's NPDES permits (Attachment 18).

3. SECTIONS 311 AND 312 OF EPCRA

The Dominion facility representatives stated that before new chemicals are stored at the facility an evaluation process is conducted. As part of the evaluation process, a letter along with a Material Safety Data Sheet is submitted to the SERC, LEPC, and Local Fire Department if the chemical is anticipated to exceed the storage threshold. Mr. Dickson (Dominion) provided the inspectors with letters pursuant to Section 311 of EPCRA spanning the calendar years 2005 through 2012 (Attachments 24 and 28, respectively).

Mr. Dickson (Dominion) provided the inspectors with Tier II Report submissions for the calendar years 2010, 2011, and 2012 (Attachments 29, 30, and 31). Mr. Dickson (Dominion) also provided the inspectors with a revised Tier II Report submission for the calendar year 2010 submitted on September 1, 2011 (Attachment 32). Mr. Dickson (Dominion) indicated that the

revised Tier II Report was submitted to better reflect the facility's use of sulfuric acid in lead acid batteries. Prior to the revision, the calendar year 2010 Tier II Report listed the only the sulfuric acid portion of the batteries and not a lead acid mixture.

During the inspection Mr. Dickson (Dominion) was unable to provide the inspectors with a maximum storage quantity list for the calendar years 2010, 2011, and 2012. Mr. Dickson (Dominion) stated that the Tier II Reports contained maximum storage information in pounds. The inspectors requested the storage capacities of the tanks onsite and any other information used to determine the storage quantities of chemicals onsite. After the inspection Mr. Dickson (Dominion) provide the inspectors with the 2012 Superfund Amendments and Reauthorization Act Calculations used in the submission of the calendar year 2012 Tier II Report (Attachment 33). Mr. Dickson (Dominion) also provided the inspectors with calendar year 2012 batteries listing and the Oil Container Table (Attachments 34 and 35, respectively).

VIII. CLOSING CONFERENCE

A facility tour was conducted following initial discussions of the release event. The tour included observations and photographs of the location of the release. After a tour of the facility, a list of additional documents that were requested during the inspection was confirmed by the inspectors. Copies of the Notice of Inspection, the Receipt for Samples and Documents, and the Meeting Sign-In Sheet were made for the facility's records (Attachments 1 through 3, respectively) and the inspection was completed.

IX. ATTACHMENTS

- 1. Notice of Inspection (1 page).
- 2. Receipt for Samples and Documents (2 pages, single-sided).
- 3. Meeting Sign-In Sheet (1 page).
- 4. Facility Map Series, Including Street, Topographical, and Aerial Maps (4 pages, single-sided).
- 5. Photograph Log (2 pages, single-sided).
- 6. Regulatory Guidance (2 pages, single-sided).
- 7. National Response Center (NRC) Incident Report No. 1038884 (2 pages, single-sided).
- 8. National Response Center (NRC) Incident Report No. 1040001 (2 pages, single-sided)
- 9. May 16, 2013 Telephone Conversation Record between Mr. Jeffrey Thomas (CGS) and Mr. Paul Dickson (Dominion) (1 page).
- May 22, 2013 Letter from Mr. Kevin Daniel (EPA) to Mr. Paul Dickson (Dominion) Confirming the Scheduled Inspection (15 pages, double-sided).
- 11. Dominion Cove Point LNG, LP Company Information (1 page).
- 12. Dominion Cove Point LNG, LP Corporate Hierarchy (1 page).

- 13. Facility Acreage Summary (1 page).
- 14. Facility Map (1 page, large format).
- 15. July 10, 2008 EPCRA Section 302 and 303 Submission (5 pages, single-sided).
- 16. December 15, 2012 through February 17, 2013 Ammonia Slip Data Report Summary (2 pages, single-sided).
- 17. Ammonia Slip Calculations (3 pages, single-sided).
- 18. July 15, 2013 Response to an Additional Information Request (6 pages, single-sided).
- 19. February 19, 2013 Initial Continuous Release Notification Report (3 pages, single-sided).
- 20. Continuous Release Initial Notification Notes (2 pages, single-sided).
- 21. Average Stack Flow and Temperatures (1 page).
- 22. Upper Bound Limit Calculation Results Summary (1 page).
- 23. March 18, 2013 Thirty (30) Day Initial Written Continuous Release Notification Report (31 pages, single-sided).
- 24. May 20, 2005 EPCRA Section 311 Submission (8 pages, single-sided).
- 25. December 15, 2006 EPCRA Section 311 Submission (12 pages, single-sided).
- 26. January 30, 2009 EPCRA Section 311 Submission (6 pages, single-sided).
- 27. September 22, 2011 EPCRA Section 311 Submission (39 pages, single-sided).
- 28. August 30, 2012 EPCRA Section 311 Submission (4 pages, single-sided).
- 29. Calendar Year 2010 Tier II Report Submission (13 pages, single-sided).
- 30. Calendar Year 2011 Tier II Report Submission (19 pages, single-sided).
- 31. Calendar Year 2012 Tier II Report Submission (16 pages, single-sided).
- 32. Calendar Year 2010 Revised Tier II Report Submission (21 pages, single-sided).
- 33. 2012 Superfund Amendments and Reauthorization Act Calculations (1 page).
- 34. 2012 Battery Listing (1 page).
- 35. Oil Container Table (9 pages, single-sided).

X. OUTSTANDING ISSUES

There are no outstanding issues at this time.

ATTACHMENT 1

Notice of Inspection





NOTICE OF INSPECTION U. S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act (EPCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
6/3/2013	N/A	N/A	9:30 a.m.	Dominion Cove Point LNG, Ltd.
4. INSPECTOR ADDRESS				5. FIRM ADDRESS
Chenega Global Services				2100 Cove Point Road
PO Box 192				Lusby, MD 20657
Downingtown, PA 19335				

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

You may, if appropriate, pursuant to Title 40 of the Code of Federal Regulations Section 2.203 paragraph (b) [40 CFR § 2.203(b)], assert a business confidentiality claim covering all or part of the information requested above. Information covered by such a claim will be handled by EPA in accordance with the procedures set forth in Subpart B, 40 CFR Part 2. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice to the company.

			7 /		
INSPECTOR SIGNATURE		RECIPTENT SIGNATURE	RECHPTENT SIGNATURE /		
Deff 1/12		Heulk DL	h)		
NAME/		MAME			
NAME/ Jeff Thomas		Paul E Dichson	N		
TITLE	DATE SIGNED	TITLE	DATE SIGNED		
Inspector	6/3/13	Env Consultent	6-3-13		

ATTACHMENT 2

Receipt for Samples and Documents

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RECEIPT FOR SAMPLES AND DOCUMENTS U. S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act (EPCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1	. INVESTIGATION IDENT	IFICATION	2. TIME	3. FIRM	NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.			
6/3/2013	N/A	N/A	9:30 a.m.	Dominion Cove Point L	NG, Ltd.
	4. INSPECTOR	ADDRESS		5. FIRM A	ADDRESS
Chenega Globa	al Services			2100 Cove Point Road	
PO Box 192				Lusby, MD 20657	
Downingtown	n, PA 19335				
	nforcement of the Emergency Plan	nning and Community Right-to-F	(now Act of 1986	vere collected in connection with the and the Comprehensive Environmen and Reauthorization Act of 1986 (SAR	tal Response,
RECE	IPT OF THE DOCUME	NT(S) AND/OR SAMP	PLE(S) DESC	CRIBED IS HEREBY ACK	(NOWLEDGED.
NO.	-	DESCRIPT	ION		PAGES (single or double)
1	Notice	of Inspec	itian		1
2		Sign-In S	_	ŧ	1
3		und Inform			1
4	Continuous R	Leleuse Notif	rication	Documentation	39-55
5_	Paul Dickson	is Logbook	from ?	2/19/13	2-55
6	7/10/08 E	invergency Pla	nning	Notification	5-ss
7	8 EPLRA 3)		
8	2010 Tu	r 11 Submitte	dare	vis ion	84.55
9	2011 Tu	r 11 Rep	ort		32-55
[0	2012 Tu	ir 11 Rep	at		28-55
INSPECTORS	INATURE /		De	GIGNATURE THE	/
Jeff Thomas		.	NAMEDAL	1 E Dichen)	
TITLE Inspector		DATE SIGNED	TITLE EN (Consultant	DATE/SIGNED

Page 2 of 2



RECEIPT FOR SAMPLES AND DOCUMENTS U. S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act (EPCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION		2. TIME	3. FIRM	NAME	
DATE	INSPECTOR NO.	DAILY SEQ. NO.			
6/3/2013	N/A	N/A	9:30 a.m.	Dominion Cove Point I	NG, Ltd.
4. INSPECTOR ADDRESS				5. FIRM A	ADDRESS
Chenega Global Services				2100 Cove Point Road	
PO Box 192				Lusby, MD 20657	
Downingtow	n, PA 19335				
	enforcement of the Emergency Plan	nning and Community Right-to-Ki	now Act of 1986 a	ere collected in connection with the nd the Comprehensive Environmen d Reauthorization Act of 1986 (SAR	tal Response,
RECE	EIPT OF THE DOCUME	NT(S) AND/OR SAMP	LE(S) DESC	RIBED IS HEREBY AC	(NOWLEDGED.
NO.	·	DESCRIPTION	ON		PAGES (single or double)
11	Facility	Map			1
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_					X
NSPECTOR 6	CNATURE		RECIPIENT	SIGNATURE)	
Jeff Thomas			NAME	E Diction x	,
TITLE		DATE, SIGNED	TITLE	c 11 1	DATEISIGNED
Inspector		4/3/13	En	Consultant	6/3/3

ATTACHMENT 3

Meeting Sign-In Sheet

Page of

Meeting Sign-In Sheet **EPCRA Inspection**

Facility Dominion Cove Point LNG, Ltd.

2100 Cove Point Road Lusby, MD 20657

Date:

6/3/2013

Time:

9:30 a.m.

TITLE

FIRM

PHONE #

Jeff Thomas

Kristie DePiero

Enforcement Support

Chenega Global Services

610-873-4114

Enforcement Support

Specialist

Specialist

Chenega Global

267-374-8120

Services

TAMMY Roberson Environmental NDE 443.286.0524

Compliance Specialist

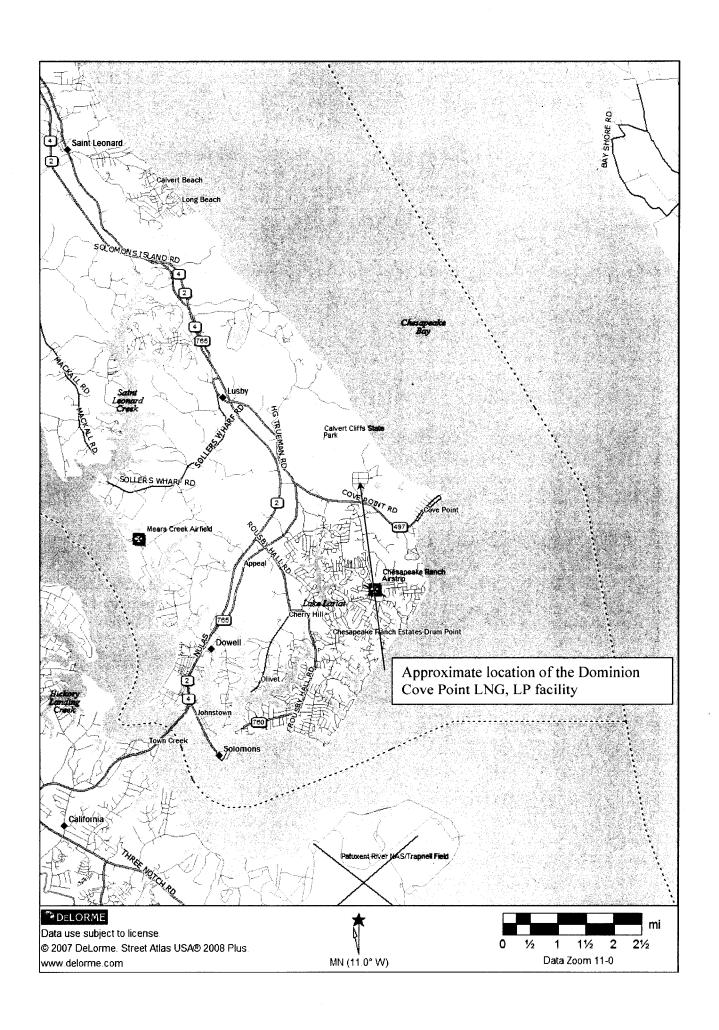
Bobby Fenwick Division Chief, Celhat Consultant Consultant Dominion Reservors 410 386 5136

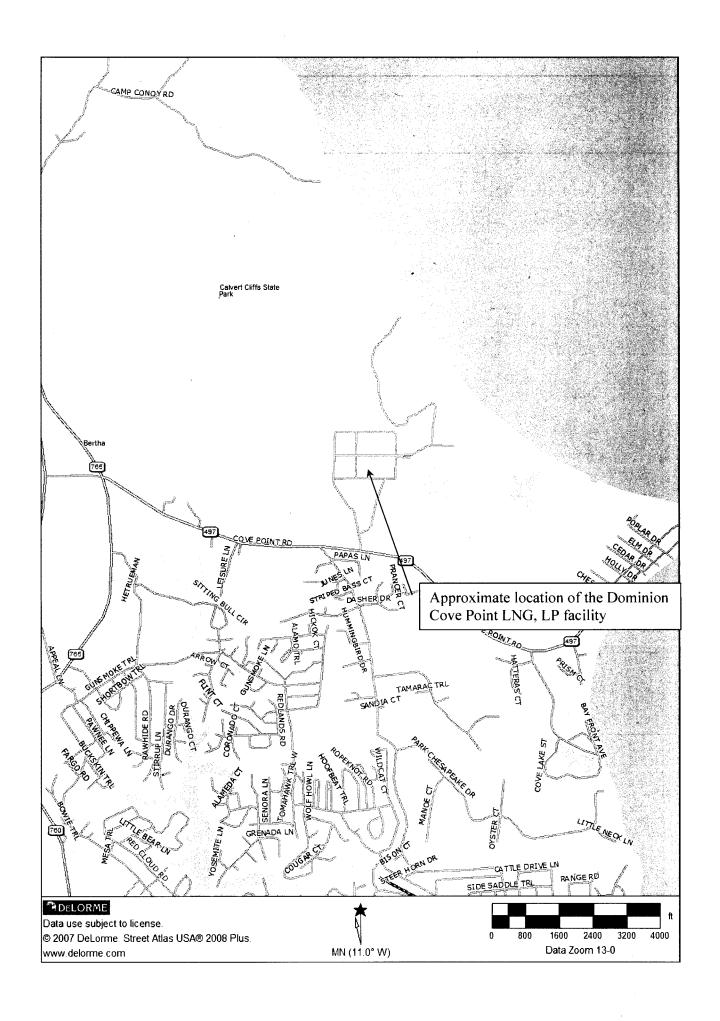
Paul Diction Environmental Consultant Dominion Reservors 410 386 5136

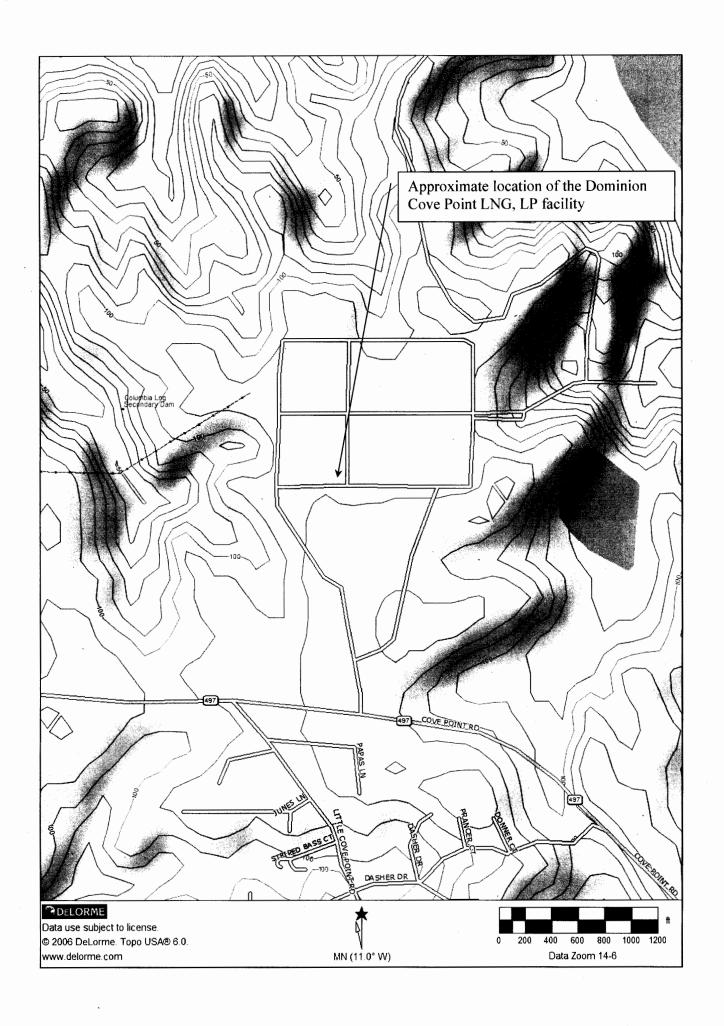
MICHAEL GARDNER MANAGER DOMINION 4102865101

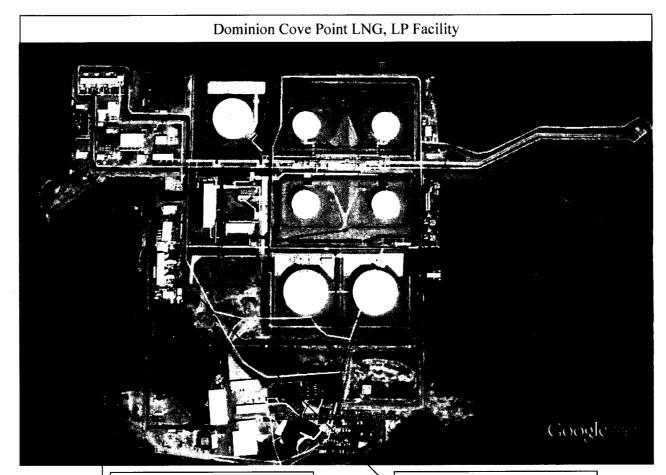
ATTACHMENT 4

Facility Map Series, Including Street, Topographical, and Aerial Maps









Location of the three (3) GE Frame 3 Turbines and SCRs

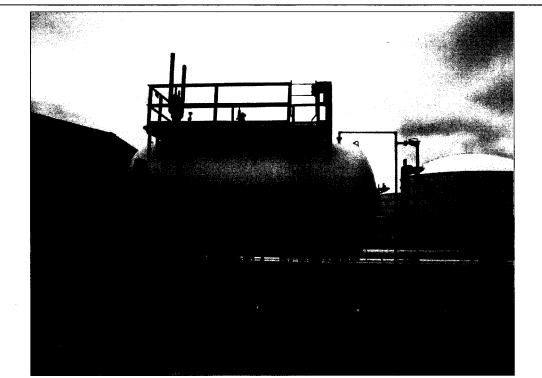
Location of the two (2) GE Frame 5 Turbines, the Solar Turbine, and the SCRs

ATTACHMENT 5

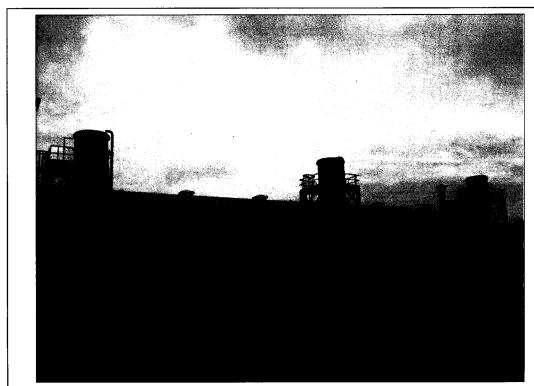
Photograph Log



Photograph 1-A view of the exhaust stacks for the Solar turbine (left) and the two (2) GE Frame 5 turbines (right) and the release points of the ammonia continuous release.



Photograph 2-A view of the ammonium hydroxide storage tank for the GE Frame 5 and Solar turbine SCRs.



Photograph 3-A view of the exhaust stacks for the three (3) GE Frame 3 turbines and the release points of the ammonia continuous release.



Photograph 4-A view of the ammonium hydroxide storage tank for the GE Frame 3 turbine SCRs.

ATTACHMENT 6

Regulatory Guidance

REGULATORY GUIDANCE

EPCRA Section 302:

The owners or operators of facilities are required to notify the State Emergency Response Commission (SERC) if any Extremely Hazardous Substances (EHSs) are present at the facility at, or above the Threshold Planning Quantity (TPQ). The TPQ means the total amount of an EHS (at concentrations greater than one percent by weight) present at any one given time. If any EHS was present at, or above the TPQ the facility must have notified the SERC prior to May 17, 1987 or notified the SERC and Local Emergency Planning Committee (LEPC) within 60 days from the time the TPQ was first reached or exceeded. Because Section 302 does not require substance-specific reporting, once an owner/operator has notified the SERC/LEPC that the facility is subject to the requirements of Section 302, subsequent acquisition of new EHSs or the listing of a substance that is present at the facility in excess of the TPQ does not require the owner/operator to re-notify the SERC nor the LEPC.

EPCRA Section 303:

If the facility is subject to Section 302, the facility must also comply with Section 303 (d) (1). This requires that the facility identify a Facility Emergency Coordinator (FEC) and submit this information to the LEPC for inclusion in the Comprehensive Emergency Response Plan (CERP). In addition, under Section 303(d) (2), a covered facility must inform the LEPC of any relevant changes occurring at the facility as such changes occur or are expected to

EPCRA Section 304/CERCLA Section 103:

Facilities must report releases of an EHS or a CERCLA Section 103(a) hazardous substance when released into the environment (i.e. air, land, surface water or ground water) in a quantity equal to or greater than an established Reportable Quantity (RQ). The RQs for these specific chemicals are located in their respective lists (Title 40 of the Code of Federal Regulations [CFR] Part 355 Appendices A and B; 40 CFR Part 302.4), as well as in the "List of Lists". If EPA has not yet established an RQ for a substance, the statutory RQ is one (1) pound. In the event of a release of an EHS in a quantity equal to or greater than the RQ, the facility must provide immediate notification and a written follow-up report to the SERC and the LEPC for all areas likely to be affected by the release. In the event of a release of a CERCLA Section 103(a) hazardous substance, or a substance listed both as an EHS and CERCLA Section 103(a) hazardous substance in quantity equal to or greater than the RQ, the facility must provide immediate notification and a written follow-up report to the SERC and the LEPC for all areas likely to be affected by the release, as well as immediate notification to the National Response Center (NRC).

EPCRA Section 311:

The requirements of Section 311 apply to any facility that is required to prepare or have available a Material Safety Data Sheet (MSDS) for a hazardous chemical under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR Part 1910.1200). The minimum threshold levels for chemicals subject to Section 311 are as follows. The minimum threshold level for hazardous chemicals for which OSHA requires a facility to prepare or have available an MSDS is 10,000 pounds (4,560 kilograms), and for EHSs the minimum threshold level is equal to its TPQ or 500 pounds (227 kilograms - approximately 55 gallons), whichever is less. Section 31 I(a) (1) requires that the owner or operator of any facility which has present the quantity of a hazardous chemical or an EHS that is equal to or greater than its minimum threshold level submit a copy of the MSDS for each such chemical, or a list identifying such chemicals, to the SERC, the LEPC, and the Fire Department.

A facility owner or operator must comply with the Section 311 reporting requirements within three (3) Months (i.e., ninety [90] days) after the facility first becomes subject to these reporting requirements by acquiring quantities of hazardous chemicals or EHSs equal to or greater than the minimum threshold levels for such chemicals.

EPCRA Section 312:

The criteria which subject a facility to reporting the hazardous chemicals and EHSs present at their facility under Section 312 are the same as those criteria for Section 311. Section 312 requires that the owner or operator of a facility submit to the SERC, the LEPC, and the Fire Department an annual Emergency and Hazardous Chemical Inventory Form for those hazardous chemicals and EHSs present (in quantities equal to or greater than the minimum threshold levels) at the facility during the preceding calendar year. This annual Emergency and Hazardous Chemical Inventory Form can take the form of a Tier I Inventory Form or Tier II Inventory Form. A Tier I Inventory Form includes an aggregate of information based on five (5) categories of physical and health hazards established by EPA. A Tier II Inventory Form includes the specific identity, quantity, and location of each hazardous chemical and EHS subject to this reporting requirement, rather than an aggregated category. A facility subject to this reporting requirement must submit a Tier I Inventory Form, or may submit a Tier II Inventory Form in lieu of the Tier I Inventory Form. However, a facility must submit a Tier II Inventory Form within thirty (30) days if specifically requested by the SERC, the LEPC, or the Fire Department.

ATTACHMENT 7

National Response Center (NRC) Incident Report No. 1038884

Extended Spill Summary Report for DataID #1342990

Report Date: 2/20/2013 Report Time: 6:59 AM EST **Hotline Log Entry Information**

Data ID: 1342990

Date Of Report: 19-FEB-13 15:37

NRC#: 1038884

State #:

Receiver: R. Rupert

ERNS#:

Material Type: Haz Material / Amount:

Location:

City: LUSBY

County: CALVERT

State: MD

Source of Pollution:

DOMINION COVE POINT LNG LP

Water Body:

State Or EPA Responded:

Initial EPA Action:

emailed C. Fitsimmons and faxed MDE

Status:

1 - Pending

URL:

Associated Action Reports

DataID: 0591719

Dodge 2012/02/20	T: 06:41	Submitted by PA2 Duty Officer		
Date: 2013/02/20	Time: 06:41	Submitted by: R03 Duty Officer		
Duty Officer/Responder Name: L. Marzulli	NRC Report #: 1038884	Hotline Log DataID: 1342990		
Action Information				
Description: This report is a Continuous Release. E-mailed report to Air, SARA Title III and EPCRA Programs.				
Person Contacted				
Name:				
Organization:				
Phone #:				

Associated NRC Report

NATIONAL RESPONSE CENTER 1-800-424-8802 ***GOVERNMENT USE ONLY***GOVERNMENT USE ONLY*** Information released to a third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1038884

INCIDENT DESCRIPTION

*Report taken by: MST2 JOSHUA DIAZ at 15:37 on 19-FEB-13

Incident Type: CONTINUOUS Incident Cause: OTHER

Affected Area:

Incident occurred on 19-FEB-13 at 15:34 local incident time.

REPORTING PARTY

Name:

PAUL DICKSON

Organization: DOMINION COVE POINT LNG LP

Address:

2100 COVE POINT RD

LUSBY, MD 20657

PRIMARY Phone: (410) 2865136

Type of Organization: PRIVATE ENTERPRISE

SUSPECTED RESPONSIBLE PARTY

Name:

PAUL DICKSON

Organization: DOMINION COVE POINT LNG LP

Address:

2100 COVE POINT RD

LUSBY, MD 20657

PRIMARY Phone: (410)2865136

Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

2100 COVE POINT RD County: CALVERT

City: LUSBY State: MD Zip: 20657

DOMINION COVE POINT LNG LP

RELEASED MATERIAL (S)

DESCRIPTION OF INCIDENT

CALLER STATED THAT THE FACILITY HAS COMBUSTION TURBINES THAT HAVE SCR'S AND THE SCR'S UTILIZE AQUEOUS AMMONIA INJECTION. THIS IS A CONTINUOUS RELEASE REPORT FOR THE AMMONIA IN THE PROCESS. THEY HAVE 3 UNITS THAT ARE SUBJECT TO THIS REGULATION AND THE FIRST ONE PRODUCES 161.8 POUNDS IN 24 HOURS. THE SECOND ONE PRODUCES 135 POUNDS IN 24 HOURS AND THE THIRD ONE PRODUCES 285.1 POUNDS IN 24 HOURS.

INCIDENT DETAILS

Continuous Release Type: INITIAL

Initial Continuous Release Number: 1038884 Continuous Release Permit: 2400900021

IMPACT

REMEDIAL ACTIONS

NOTIFICATIONS BY NRC

ADDITIONAL INFORMATION CONTINUOUS RELEASE MATERIAL

CHRIS Code: AHM

Official Material Name: AMMONIUM HYDROXIDE

Also Known As:

Upper Bounds: 161.8 POUND(S)/DAY

*** END INCIDENT REPORT #

1038884 **

Report any problems by calling 1-800-424-8802 PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

ATTACHMENT 8

National Response Center (NRC) Incident Report No. 1040001

NATIONAL RESPONSE CENTER 1-800-424-8802

*** For Public Use ***

Information released to a third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1040001

INCIDENT DESCRIPTION

*Report taken at 11:37 on 04-MAR-13

Incident Type: CONTINUOUS Incident Cause: OTHER

Affected Area:

The incident occurred on 19-FEB-13 at 15:34 local time.

Affected Medium: AIR ATMOSPHERE

SUSPECTED RESPONSIBLE PARTY

Organization:

DOMINION COVE POINT LNG LP

LUSBY, MD 20657

Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

2100 COVE POINT RD County: CALVERT City: LUSBY State: MD Zip: 20657

RELEASED MATERIAL(S)

DESCRIPTION OF INCIDENT

CALLER STATED THAT THE FACILITY HAS COMBUSTION TURBINES THAT HAVE SCR'S AND THE SCR'S UTILIZE AQUEOUS AMMONIA INJECTION. THIS IS A CONTINUOUS RELEASE REPORT FOR THE AMMONIA IN THE PROCESS. THEY HAVE 3 UNITS THAT ARE SUBJECT TO THIS REGULATION AND THE FIRST ONE PRODUCES 161.8 POUNDS IN 24 HOURS. THE SECOND ONE PRODUCES 135 POUNDS IN 24 HOURS AND THE THIRD ONE PRODUCES 285.1 POUNDS IN 24 HOURS. /// THIS IS AN UPDATE TO REPORT NUMBER 1038884/// ALL INFORMATION IS STILL THE SAME AS THE ORIGINAL REPORT.

INCIDENT DETAILS

Continuous Release Type: INITIAL

Initial Continuous Release Number: 1038884 Continuous Release Permit: 2400900021

DAMAGES

Fire Involved: NO

Fire Extinguished: UNKNOWN

INJURIES:

NO

Hospitalized:

Empl/Crew:

Passenger:

FATALITIES:

NO

Empl/Crew:

Passenger:

Occupant:

EVACUATIONS:

NO

Who Evacuated:

Description of Closure

Radius/Area:

Damages:

NO

Length of

Direction of

Closure Type

Closure

Closure

Air:

Road: N

Major Artery: N

N Waterway:

5/13/13

Track:

Passengers Transferred: NO Environmental Impact: UNKNOWN

N

Media Interest: NONE Community Impact due to Material:

REMEDIAL ACTIONS

Release Secured: UNKNOWN

Release Rate:

Estimated Release Duration:

WEATHER

Weather: UNKNOWN, °F

ADDITIONAL AGENCIES NOTIFIED

Federal:

State/Local:

State/Local On Scene: State Agency Number:

NOTIFICATIONS BY NRC

ATLANTIC STRIKE TEAM (MAIN OFFICE)

04-MAR-13 11:45

CG INVESTIGATIVE SERVICE BALTIMORE (MAIN OFFICE)

04-MAR-13 11:45

DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)

04-MAR-13 11:45

CONT. RELEASE (MAIN OFFICE)

04-MAR-13 11:45

CONT. RELEASE 3 (MAIN OFFICE)

04-MAR-13 11:45

U.S. EPA III (MAIN OFFICE)

04-MAR-13 11:46

NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)

04-MAR-13 11:45

NOAA RPTS FOR MD (MAIN OFFICE)

04-MAR-13 11:45

NATIONAL RESPONSE CENTER HQ (MAIN OFFICE)

04-MAR-13 11:47

NATIONAL RESPONSE CENTER HQ (AUTOMATIC REPORTS)

04-MAR-13 11:45

MD DEPT OF ENV (MAIN OFFICE)

04-MAR-13 11:45

MD EMERGENCY MANAGEMENT AGENCY (MAIN OFFICE)

04-MAR-13 11:45

USCG DISTRICT 5 (D5 DRAT)

04-MAR-13 11:45

ADDITIONAL INFORMATION

CONTINUOUS RELEASE MATERIAL

CHRIS Code: AHM Official Material Name: AMMONIUM HYDROXIDE

Also Known As:

Upper Bounds: 161.8 POUND(S)/DAY

*** END INCIDENT REPORT # 1040001 ***

ATTACHMENT 9

May 16, 2013 Telephone Conversation Record between Mr. Jeffrey Thomas (CGS) and Mr. Paul Dickson (Dominion)

TELEPHONE CONVERSAT	TON RECORD (2-sided Form)		
CONVERSATION WITH:	RECORD OF PHONE CALL ATTEMPTS:		
NAME: Paul Dickson	DATE: 05 / 16 / 13 () left message		
COMPANY: Dominion Cove Point LNG, LP	TIME: 1127 hours (A) see notes (D) no answer		
ADDRESS: 2100 Cove Point Rd			
Lusby, MD 20657	DATE:/ () left message see notes TIME:AM/PM () no answer		
PHONE NO.: 410-286-5136			
SUBJECT: EPCRA Inspection Scheduling	() ORIGINATOR PLACED CALL () ORIGINATOR RECEIVED CALL		
	() SAGE VIEW CALL		
* NOT	TC *		
On May 16, 2013, Mr. Jeffrey Thomas of (
the listed telephone number of the Domir			
Mr. Paul Dickson, Dominion Environmenta			
he was attempting to schedule a CERCLA S	**		
303, 304, 311, and 312 inspection at the			
Maryland regarding a reported continuous			
on February 19, 2013. Mr. Dickson and M			
would be conducted on June 3, 2013 at 9:			
			
\sim			
- I Water			
——————————————————————————————————————			
MESS	SAGE CONTINUES ON REVERSE SIDE)? VES NO		
FOLVOW IT A COTON			
FOLLOW-UP ACTION:			
COPY/ROUTE TO:	□ FOLLOW-UP		
	O FILE		

ATTACHMENT 10

May 22, 2013 Letter from Mr. Kevin Daniel (EPA) to Mr. Paul Dickson (Dominion) Confirming the Scheduled Inspection



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

VIA ELECTRONIC MAIL MESSAGE
Paul.e.dickson@dom.com, and
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 2 2 2013

Mr. Paul Dickson Environmental Consultant Dominion Cove Point LNG, Ltd. 2100 Cove Point Road Lusby, MD 20657

Re: Dominion Cove Point LNG, Ltd.

Dear Mr. Dickson:

The purpose of this letter is to confirm that on June 3, 2013 at 9:30 a.m., the U.S. Environmental Protection Agency ("EPA") will conduct an inspection of the Dominion Cove Point LNG, Ltd. ("Dominion") facility located at 2100 Cove Point Road in Lusby, Maryland. This inspection will be conducted pursuant to the Emergency Planning and Community Right-to-Know Act ("EPCRA") and the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"). EPA's primary focus during this inspection will be to gather information regarding compliance with Section 304 of EPCRA and Section 103 of CERCLA regarding a continuous release involving anhydrous ammonia and or ammonium hydroxide, which occurred on February 19, 2013. Information regarding Dominion's compliance with Sections 302, 303, 311, and 312 of EPCRA will also be reviewed with facility representatives during this inspection.

The inspection will be conducted by Chenega Global Services, LLC ("CGS"), a contractor to EPA under the Enforcement Support Services and Community Involvement Support Contract, EP-S3-09-02. CGS is designated by the Administrator of the U. S. EPA to conduct inspections pursuant to EPCRA and CERCLA. CGS representatives are authorized to have access to Confidential Business Information and have signed a Non-Disclosure agreement regarding such information.

The scope of the inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviewing and taking statements; reviewing of chemical manufacturing, importing, processing; and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to gather information relative to compliance with EPCRA for the Dominion facility located at 2100 Cove Point Road in Lusby, Maryland.

The inspectors will review and may obtain copies of the following documents:

- Calendar years 2010, 2011 and 2012 on-site inventories of all chemical substances and mixtures used, stored, processed and/or manufactured at each facility. Include, in this summary, chemical names with Chemical Abstracts Service ("CAS") number and maximum quantities on-hand at any one time.
- A copy of the notifications to the State Emergency Response Commission ("SERC"), or the Local Emergency Planning Committee ("LEPC"), indicating that an Extremely Hazardous Substance ("EHS") is stored in quantities equal to or greater than the Threshold Planning Quantity ("TPQ"), as required by EPCRA §302.
- A copy of any correspondence to the SERC, or the LEPC, verifying an identified Facility Emergency Coordinator ("FEC"), as required by EPCRA §303.
- Copies of Material Safety Data Sheets ("MSDSs"), or the list of MSDS chemicals, your facility submitted to the appropriate SERC, LEPC, and local Fire Department for those chemicals present in quantities which meet or exceed the applicable TPQ or threshold level, as required by EPCRA §311.
- Copies of Tier II Report forms submitted to the appropriate SERC, LEPC, and local Fire Department for those chemicals subject to EPCRA §311 at your facility during calendar years 2010, 2011, and 2012, as required by EPCRA §312.
- Any Federal or State permits under which the release may have been covered, including permitted levels of emissions.
- Any continuous release reports for CERCLA §103(f) under which the release may have been covered.
- Copies of any information regarding the reported release. Information may include, but it's not limited to, incident reports, follow-up reports, and analytical data, monitoring data, documentation generated as a result of the release investigations and physical materials related to the release (i.e. valves, piping and/or other equipment associated with each release). Please have facility personnel provide a clear timeline of events for the release

To facilitate the inspection process and minimize the time the inspectors need to be at your facility, please have these documents ready at the time of the inspection. In addition, please have available a site plan or facility diagram, as well as a written general description of your business operations including: Standard Industrial Classification ("SIC") Code; North American Industry Classification System ("NAICS") Code; year business began operations; year and state

of incorporation; calendar year 2012 estimated annual revenue; number of employees; branch locations; headquarters or parent offices; and company officials (e.g., President, CEO, Plant or Branch Managers). Please provide this information on company letterhead or other documentation which clearly indicates your company name, address, city, and state.

You may, if appropriate, pursuant to the procedures set forth at 40 C.F.R. § 2.203(b), assert a business confidentiality claim covering all or part of the information requested above. Information covered by such a claim will be handled by EPA in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice to the company.

On April 11, 2000, EPA issued its revised final "Small Business Compliance Policy". This policy implements, in part, the Executive Memorandum of Regulatory Reform (60 Federal Register 20261, April 26, 1995) and Section 323 of the Small Business Regulatory Enforcement Fairness Act ("SBREFA"). Attached with this letter you will also find a SBREFA Information Sheet which will provide you with a variety of compliance assistance tools to assist you in complying with federal and state environmental laws. In addition, EPA has an informative website for Small Business Compliance and Enforcement, including the SBREFA Information Sheet, at: http://www.epa.gov/compliance/incentives/smallbusiness/

If at all possible, please provide the inspectors with a convenient location (e.g., office, conference room) to conduct the inspection and complete their paperwork. The inspectors may need to have access to a telephone. Please also be prepared to have a knowledgeable operations/maintenance facility representative available to accompany the inspectors on a tour of your facility.

The inspectors will provide you with a partial list of chemicals subject to SARA Title III, a guide to SARA Title III, and instructions to assist you in preparing documents necessary to determine compliance.

If you have any questions, or if for security or clearance reasons you need any additional information pertinent to the individuals who will be conducting the subject inspection, please contact Perry Pandya, EPCRA Coordinator, at (215) 814-2167.

Sincerely,

Kevin Daniel, Acting Chief Oil and Prevention Branch

Ken Daniel

Attachments:

Mr. Paul Dickson Dominion Cove Point LNG, Ltd. Page 4

Recommended format for on-site inventories EPCRA Fact Sheets SBREFA Information Sheet

cc: Case File (03-MD-2013-021)
Jeffrey Thomas (CGS)
Craig Yussen (3WC33)
Patricia Williams (MDE)

Attachment 1

Recommended format for on-site inventories

Please provide a list of all the hazardous chemicals, mixtures, and/or EHSs that you had on-site during calendar years 2010, 2011, and 2012, and for which the Occupational Safety and Health Administration ("OSHA") requires that you have a Material Safety Data Sheet ("MSDS"). Please provide quantities for each of these substances for each year as well. Mixtures should be broken down into components by percentages. Include the Chemical Abstracts Service ("CAS") numbers (if available) for all hazardous chemicals. The table below lists examples and a recommended format.

Page Cape Provided Cape Page Cape (1995) Cape Page Cape (1995)	1	i deja Selikelijsk	#3.04 5.1A.V. A.94() 30.388. ()	24. Max X 10.4411 	Almie Mener Parti Colora
Pure Chemical OR Chemical Name from product			·		
Sulfuric acid	100%	7664 - 93-9	12,500 (total)	12,000 (total)	13,000 (total)
Xylene from yellow paint #2 from degreaser A12 pure	25% 35% 100%	1330-20-7	25,500 (total) 8,000 8,500 9,000	22,000 (total) 9,000 8,400 4,600	13,300 (total) 7,150 2,150 4,000
Toluene from degreaser A12 from yellow paint #2 from orange paint #5 pure	50% 20% 5% 100%	108-88-3	35,600 (total) 9,300 9,200 8,100 9,000	37,000 (total) 9,300 9,200 8,100 10,400	37,000 (total) 9,300 9,200 8,100 10,400



The Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) establishes requirements for Federal, State and local governments, Indian Tribes, and industry regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment.



What Does EPCRA Cover?

EPCRA has four major provisions:

- Emergency planning (Section 301-303),
- Emergency release notification (Section 304).
- Hazardous chemical storage reporting requirements (Sections 311-312), and
- Toxic chemical release inventory (Section 313).

Information gleaned from these four requirements will help States and communities develop a broad perspective of chemical hazards for the entire community as well as for individual facilities. Regulations implementing EPCRA are codified in Title 40 of the Code of Federal Regulations, parts 350 to 372. The chemicals covered by each of the sections are different, as are the quantities that trigger reporting. Table 1 on the next page summarizes the chemicals and thresholds.

What Are Emergency Response Plans (Sections 301-303)?

Emergency Response plans contain information that community officials can use at the time of a chemical accident. Community emergency response plans for chemical accidents were developed under section 303. The plans must:

- Identify facilities and transportation routes of extremely hazardous substances;
- Describe emergency response procedures, on and off site;
- Designate a community coordinator and facility coordinator(s) to implement the plan;
- Outline emergency notification procedures;
- Describe how to determine the probable affected area and population by releases;
- Describe local emergency equipment and facilities and the persons responsible for them;
- Outline evacuation plans;
- Provide a training program for emergency responders (including schedules); and,
- Provide methods and schedules for exercising emergency response plans.

Planning activities of LEPCs and facilities initially focused on, but were not limited to, the 356 extremely hazardous substances listed by EPA. The list includes the threshold planning quantities (minimum limits) for each substance. Any facility that has any of the listed chemicals at or above its threshold planning quantity must notify the SERC and LEPC within 60 days after they first receive a shipment or produce the substance on site.

What Are the Emergency Notification Requirements (Section 304)?

Facilities must immediately notify the LEPC and the SERC if there is a release into the environment of a hazardous substance that is equal to or exceeds the minimum reportable quantity set in the regulations. This requirement covers the 356 extremely hazardous substances as well as the more than 700 hazardous substances subject to the emergency notification requirements under CERCLA Section 103(a)(40 CFR 302.4). Some chemicals are common to both lists. Initial notification can be made by telephone, radio, or in person. Emergency notification requirements involving transportation incidents can be met by dialing 911, or in the absence of a 911 emergency number, calling the operator. This emergency notification needs to include:

- · The chemical name;
- An indication of whether the substance is extremely hazardous;
- An estimate of the quantity released into the environment;
- · The time and duration of the release;
- Whether the release occurred into air, water, and/or land:
- Any known or anticipated acute or chronic health risks associated with the emergency, and where necessary, advice regarding medical attention for exposed individuals;
- Proper precautions, such as evacuation or sheltering in place; and,

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The statement of the state

• Name and telephone number of contact person.

A written follow-up notice must be submitted to the SERC and LEPC as soon as practicable after the release. The follow-up notice must update information included in the initial notice and provide information on actual response actions taken and advice regarding medical attention necessary for citizens exposed.

	and the state of t	s and Reporting		S-41-212
	Section 302	Section 304	Sections 311/312	Section 313
Chemicals Covered	356 extremely hazardous substances	>1,000 substances	500,000 products	650 toxic chemicals and categories
Thresholds	Threshold Planning Quantity 1-10,000 pounds on site at any one time	Reportable quantity, 1-5,000 pounds, released in a 24-hour period	TPQ or 500 pounds for Section 302 chemicals; 10,000 pounds on site at any one time for other chemicals	25,000 pounds per year manufactured or processed; 10,000 pounds a year used; certain persistent bioaccumulative toxics have lower thresholds

What Are the Community Right-to-know Requirements (Sections 311/312)?

Under Occupational Safety and Health Administration (OSHA) regulations, employers must maintain a material safety data sheet (MSDS) for any hazardous chemicals stored or used in the work place. Approximately 500,000 products have MSDSs.

Section 311 requires facilities that have MSDSs for chemicals held above certain quantities to submit either copies of their MSDSs or a list of MSDS chemicals to the SERC, LEPC, and local fire department. If the facility owner or operator chooses to submit a list of MSDS chemicals, the list must include the chemical or common name of each substance and must identify the applicable hazard categories. These hazard categories are:

- · Immediate (acute) health hazard;
- · Delayed (chronic) health hazard;
- · Fire hazard;
- · Sudden release of pressure hazard; and
- Reactive hazard.

If a list is submitted, the facility must submit a copy of the MSDSs for any chemical on the list upon the request of the LEPC or SERC.

Facilities that start using a chemical or increase the quantity to exceed the thresholds must submit MSDSs or a list of MSDSs chemicals within three months after they become covered. Facilities must provide a revised MSDS to update the original MSDS if significant new information is discovered about the hazardous chemical.

Facilities covered by section 311 must, under section 312, submit annually an emergency and hazardous chemical inventory form to the LEPC, the SERC, and the local fire department. Facilities provide either a Tier I or Tier II form. Tier I forms include the following aggregate information for each applicable hazard category:

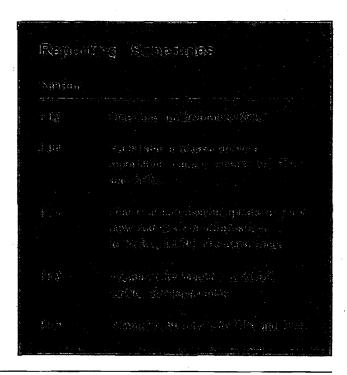
- An estimate (in ranges) of the maximum amount of chemicals for each category present at the facility at any time during the preceding calendar year;
- An estimate (in ranges) of the average daily amount of chemicals in each category; and,
- The general location of hazardous chemicals in each category.

The Tier II report contains basically the same information as the Tier I, but it must name the specific chemicals. Many states require Tier II information under state law. Tier II forms provide the following information for each substance:

- The chemical name or the common name as indicated on the MSDS;
- An estimate (in ranges) of the maximum amount of the chemical present at any time during the preceding calendar year and the average daily amount;
- A brief description of the manner of storage of the chemical;
- · The location of the chemical at the facility; and
- An indication of whether the owner elects to withhold location information from disclosure to the public.

Because many SERCs have added requirements or incorporated the Federal contents in their own forms, Tier I/II forms should be obtained from the SERC. Section 312 information must be submitted on or before March 1 each year. The information submitted under sections 311 and 312 is available to the public from LEPCs and SERCs.

In 1999, EPA excluded gasoline held at most retail gas stations from EPCRA 311/312 reporting. EPA estimates that about 550,000 facilities are now covered by EPCRA 311/312 requirements.



What is the Toxics Release Inventory (Section 313)?

EPCRA section 313 (commonly referred to as the Toxics Release Inventory or TRI) requires certain facilities (see box) to complete a Toxic Chemical Release Inventory Form annually for specified chemicals. The form must be submitted to EPA and the State on July 1 and cover releases and other waste management of toxic chemicals that occurred during the preceding calendar year. One purpose of this reporting requirement is to inform the public and government officials about releases and other waste management of toxic chemicals. The following information is required on the form:

- · The name, location and type of business;
- Whether the chemical is manufactured (including importation), processed, or otherwise used and the general categories of use of the chemical;
- An estimate (in ranges) of the maximum amounts of the toxic chemical present at the facility at any time during the preceding year;
- Quantity of the chemical entering the air, land, and water annually;
- Off-site locations to which the facility transfers toxic chemicals in waste for recycling, energy recovery, treatment or disposal; and
- Waste treatment/disposal methods and efficiency of methods for each waste stream;

In addition, the Pollution Prevention Act of 1990 requires collection of information on source reduction, recycling, and treatment. EPA maintains a national TRI database, available on the Internet (see the Where Can I Find EPCRA Information? section for further details).

What Else Does EPCRA Require?

Trade Secrets. EPCRA section 322 addresses trade secrets as they apply EPCRA sections 303, 311, 312, and 313 reporting; a facility cannot claim trade secrets under section 304 of the statute. Only chemical identity may be claimed as a trade secret, though a generic class for the chemical must be provided. The criteria a facility must meet to claim a chemical identity as a trade secret are in 40 CFR part 350. In practice, less than one percent of facilities have filed such claims.

Even if chemical identity information can be legally withheld from the public, EPCRA section 323 allows the

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information to be disclosed to health professionals who need the information for diagnostic and treatment purposes or local health officials who need the information for prevention and treatment activities. In non-emergency cases, the health professional must sign a confidentiality agreement with the facility and provide a written statement of need. In medical emergencies, the health professional, if requested by the facility, provides these documents as soon as circumstances permit.

Any person may challenge trade secret claims by petitioning EPA. The Agency must then review the claim and rule on its validity.

EPCRA Penalties. EPCRA Section 325 allows civil and administrative penalties ranging up to \$10,000-\$75,000 per violation or per day per violation when facilities fail to comply with the reporting requirements. Criminal penalties up to \$50,000 or five years in prison apply to any person who knowingly and willfully fails to provide emergency release notification. Penalties of not more than \$20,000 and/or up to one year in prison apply to any person who knowingly and willfully discloses any information entitled to protection as a trade secret.

<u>Citizens Suits.</u> EPCRA section 326 allows citizens to initiate civil actions against EPA, SERCs, and the owner or operator of a facility for failure to meet the EPCRA requirements. A SERC, LEPC, and State or local government may institute actions against facility owner/operators for failure to comply with EPCRA requirements. In addition, States may sue EPA for failure to provide trade secret information.

Where Can You Find EPCRA Information?

MSDSs, hazardous chemical inventory forms, follow-up emergency notices, and the emergency response plan are available from the SERC and LEPC.

MSDSs on hazardous chemicals are maintained by a number of universities and can be accessed through www.hazard.com.

EPA also provides fact sheets and other information on chemical properties through its website: www.epa.gov. EPA has compiled a list of all chemicals covered by name under these regulations into a single list and published them as The Title III List of Lists available at www.epa.gov/swercepp/ds-epds.htm#title3.

Profiles of extremely hazardous substances are available at www.epa.gov/ceppo/ep_chda.htm#ehs

Each year, EPA publishes a report summarizing the TRI information that was submitted to EPA and States during the previous year. In addition, TRI data are available through EPA's Envirofacts database at www.epa.gov/enviro. TRI data are also available at www.epa.gov/tri, www.rtk.net, and www.scorecard.org.

All of these sites can be searched by facility, city, county, and state and provide access to basic TRI emissions data. The RTK-Net site, maintained by the public advocacy group OMB Watch, provides copies of the full TRI form for each facility. The Scorecard site, maintained by the Environmental Defense public advocacy group, ranks facilities, States, and counties on a number of parameters (e.g., total quantities of carcinogens released) as well as maps that show the locations of facilities in a county or city.

Initial emergency release notifications made to the National Response Center or EPA are available on line at www.epa.gov/ernsacct/pdf/index.html.

A list of LEPCs and SERCs is available at http://www.RTK.NET:80/lepc/.

Many of these sites can also be accessed through www.epa.gov/ceppo/.

Are There Other Laws That Provide Similar Information?

The Oil Pollution Act (OPA) of 1990 includes national planning and preparedness provisions for oil spills that are similar to EPCRA provisions for extremely hazardous substances. Plans are developed at the local, State and Federal levels. The OPA plans offer an opportunity for LEPCs to coordinate their plans with area and facility oil spill plans covering the same geographical area.

The 1990 Clean Air Act Amendments require the EPA and OSHA to issue regulations for chemical accident prevention. Facilities that have certain chemical above specified threshold quantities are required to develop a risk management program to identify and evaluate hazards and manage those hazards safely. Facilities subject to EPA's risk management program rules must submit a risk management plan (RMP) summarizing its program. Most RMP information is available through RMP*Info, which can be accessed through www.epa.gov/enviro.

For More Information

Contact the EPCRA Hotline at: (800) 424-9346 or (703) 412-9810 TDD (800) 553-7672 Monday - Friday, 9 AM to 6 PM, EST

Visit the CEPPO Home Page at: WWW.EPA.GOV/CEPPO/

For EPA EPCRA contacts, check the CEPPO home page. For TRI program officials and EPA TRI regional contacts, check www.epa.gov/tri/statecon.htm.

Office of Solid Waste and Emergency Response October 2008 www.epa.gov/emergencies FACT SHEET

AMENDMENTS TO EMERGENCY PLANNING AND NOTIFICATION; EMERGENCY RELEASE NOTIFICATION AND HAZARDOUS CHEMICAL REPORTING. 40 CFR Parts 355 and 370.

On October 17th, 2008, EPA finalized several changes to the Emergency Planning and Community Right-to-Know Act (EPCRA) regulations (40 CFR Parts 355 and 370). These changes were proposed on June 8, 1998 (63 FR 31268). Facilities subject to these regulations, State Emergency Response Commissions (SERCs); Local Emergency Planning Committees (LEPCs) and fire departments should become familiar with the new regulation.

All sections of 40 CFR Parts 355 and 370 will be in plain language, using a question and answer format.

There are only minor changes to the emergency planning and emergency release notification sections. For hazardous chemical reporting regulations, there are changes regarding the Tier I and Tier II forms, as well as changes in how to report hazardous chemicals in a mixture.

Tier I and Tier II Forms

- The Tier I and Tier II forms and their instructions have been removed from the code of federal regulations (CFR). They may now be found on EPA's Web site: www.epa.gov/emergencies.
- The revised regulation includes a description of the requirements for Tier I and Tier II. Facilities are now
 required to report their North American Industry Classification System (NAICS) code on the Tier I or Tier
 II form.
- Also, the chemical or common name of the chemical as provided on the Material Safety Data Sheet must be provided on the Tier II form.

EPA encourages facilities to contact their State to determine whether any additional requirements or formats are required by the State.

Hazardous Chemical Inventory Reporting for Chemicals in Mixtures

- When determining whether the threshold quantity of an extremely hazardous substance (EHS) has been met, facilities must include the total quantity of that EHS present in the pure form as well as in any mixture, even if any mixture including the EHS is also being reported as a hazardous chemical.
- For hazardous chemicals that are mixtures and do not contain any extremely hazardous substance, facilities have an option when determining whether the threshold quantity is present: (1) add together the quantity present in its pure form and as a component in all mixtures (even if the mixture is also being reported as a hazardous chemical), or (2) consider the total quantity of each mixture separately.

Where can I go for more information?

- Consult our Web site: www.epa.gov/emergencies.
- Sign up for our list serve to receive periodic updates: www.epa.gov/emergencies/newsroom.htm#listservs
- Call the Superfund, TRI, EPCRA, RMP, and Oil Information Center: 800-424-9346 or 703-412-9810; TDD 800-553-7672 or 702-412-3323.



The United States Environmental Protection Agency provides an array of resources, including workshops, training sessions, hotlines, websites and guides, to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

EPA's Small Business Websites

Small Business Environmental Homepage - www.smallbiz-enviroweb.org Small Business Gateway - www.epa.gov/smallbusiness

EPA's Small Business Ombudsman - www.epa.gov/sbo or 1-800-368-5888

EPA's Compliance Assistance Homepage

www.epa.gov/compliance/assistance/business.html

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

EPA's Compliance Assistance Centers www.assistancecenters.net

EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

www.epa.gov/agriculture/

Automotive Recycling www.ecarcenter.org

Automotive Service and Repair www.ccar-greenlink.org or 1-888-GRN-LINK

Chemical Manufacturing www.chemalliance.org

Construction www.cicacenter.org or 1-734-995-4911

Education

www.campuserc.org

Food Processing

www.fpeac.org

Healthcare

www.hercenter.org

Local Government

www.lgean.org

Metal Finishing www.nmfrc.org

Paints and Coatings

www.paintcenter.org

Printed Wiring Board Manufacturing www.pwbrc.org

Printing

www.pneac.org

Ports

www.portcompliance.org

U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

Hotlines, Helplines and Clearinghouses

www.epa.gov/epahome/hotline.htm

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

Antimicrobial Information Hotline

info-antimicrobial@epa.gov or 1-703-308-6411

Clean Air Technology Center (CATC) Info-line

www.epa.gov/ttn/catc or 1-919-541-0800

Emergency Planning and Community Right-To-Know Act

www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 734-214-4100

National Pesticide Information Center www.npic.orst.edu/ or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills www.nrc.useg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC)

www.epa.gov/opptintr/ppic or 1-202-566-0799

Safe Drinking Water Hotline

www.epa.gov/safewater/hotline/index. html or 1-800-426-4791

Stratospheric Ozone Protection Hotline www.epa.gov/ozone or 1-800-296-1996

Toxic Substances Control Act (TSCA) Hotline

tsca-hotline@epa.gov or 1-202-554-1404

Wetlands Information Helpline

www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828

State and Tribal Web-Based Resources

State Resource Locators

www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

www.smallbiz-enviroweb.org

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits. The website is a central point for sharing resources between EPA and states.

EPA's Tribal Compliance Assistance Center www.epa.gov/tribalcompliance/index.html

The Center provides material to Tribes on environmental stewardship and regulations that might apply to tribal government operations.

EPA's Tribal Portal

www.epa.gov/tribalportal/

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy

www.epa.gov/compliance/incentives/smallbusiness/index.html

This Policy offers small businesses special incentives to come into compliance voluntarily.

EPA's Audit Policy

www.epa.gov/compliance/incentives/auditing/auditpolicy.html

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or go to their website at www. sba.gov/ombudsman.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

Guidance on Reporting Options for Sections 311 and 312 and Some Interpretations

Introduction

EPA provided draft guidance in the preamble to the June 8, 1998 proposed rule (63 FR 31268) to streamline the reporting requirements for facilities under sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). The Agency did not propose any regulatory changes, but sought comments on the following reporting options.

- Underground Storage Tank (UST) Forms to fulfill the requirements for Tier I information under EPCRA section 312;
- Partnership Programs for joint access to information and streamlined submission of EPCRA sections 311 and 312 reporting. If a single point submission is allowed for facilities, then one agency would receive the information and provide access to the other agencies;
- 3. Electronic submittal and certification for EPCRA section 312 reporting;
- 4. Incorporation of previous submissions into EPCRA section 312 reporting;
- 5. Electronic access to facility Material Safety Data Sheet (MSDS) database; and
- 6. EPCRA section 312 reporting to fulfill reporting requirements under section 311.

EPA is now providing guidance on these reporting options. The objective for this guidance is also to provide state and local agencies with flexibility in implementing sections 311 and 312 of EPCRA.

Who is Affected by this Guidance and Interpretation?

Entities that will be affected include those organizations and facilities subject to sections 302, 304, 311 and 312 of EPCRA and the implementing regulations found in 40 CFR parts 355 and 370.

EPA's Decision on These Proposed Options

UST Forms

 Since all states now require facilities to submit a Tier II inventory form or the state equivalent form, this reporting option is no longer useful.

Partnership Programs for Joint Access to Information and Submission of EPCRA 311 and 312 Reporting

- States may implement the Partnership Programs for Joint Access reporting option; however, they must ensure that statutory and regulatory requirements are met. If states choose to implement this option, a formal agreement is necessary between the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and fire department. States should then notify the facilities about this agreement and the new submission process.
- States must also meet the March 1 reporting deadline, as specified in the statute.

Electronic Submittal and Certification for EPCRA Section 312 Reporting

- States may require facilities to submit information using Tier2 Submit, the federal electronic reporting format, or the state equivalent electronic reporting format. If facilities do not have the capability to file information electronically, states should allow these facilities to submit paper copies of the Tier II report.
- The original signature requirement in 40 CFR 370.41 and 370.42 could be met by providing the certification statement on paper or by any electronic certification established by the state and local agencies.

Incorporation of Previous Submissions into EPCRA Section 312 Reporting

- Facilities are required to submit a Tier I form or, if requested, a Tier II form annually to the SERC, LEPC, and the fire department, even if the information from the previous year has not changed. Most states have established electronic reporting or are using Tier2 Submit software developed by EPA. Therefore, the burden for facilities to re-create information on paper does not exist for most facilities.
- States may adopt this reporting option for those facilities that submit section 312 information on paper.

Electronic Access to Facility MSDS Database

- Section 311 of EPCRA requires facilities to submit MSDSs for hazardous chemicals that meet or exceed the reporting thresholds to the SERC, LEPC, and the fire department. The Agency suggested electronic submission of MSDSs or providing access to facilities' MSDS database to reduce the burden on the regulated community and reduce the information management burden on implementing agencies.
- Due to security concerns and several entities lacking access to computers or on-line systems, EPA has rejected this reporting option.

EPCRA Section 312 Reporting to Fulfill Reporting Requirements under Section 311

- This reporting option is only beneficial to those facilities that acquire a new chemical between October 1 and December 31 of any given calendar year.
- States may implement this reporting approach ensuring that facilities comply with section 312 three months after acquiring a new chemical.

What are the Interpretations of Emergency Release Notification and Hazardous Chemical Exemption for solids?

The Agency is also providing new interpretations and revising existing interpretations to help facilities comply with certain requirements under EPCRA.

Emergency Release Notification

 Under EPCRA section 304, facilities may have up to 30 days to submit a written follow-up report to state and local agencies. States may implement more rigorous requirements.

Hazardous Chemical Exemption for Solids under EPCRA Section 311 (e)(2)

Facilities would only have to count the amount of fume or dust given off a piece of metal, brick, or any other manufactured solid item that undergoes a modification process. States may implement more rigorous requirements.

Where Do I Go For More Information?

For more information on this guidance, please visit the Office of Emergency Management Web site: http://www.epa.gov/emergencies/.

ATTACHMENT 11

Dominion Cove Point LNG, LP Company Information



Dominion Cove Point LNG, LP 2100 Cove Point Road, Lusby, MD 20657

Web Address: www.dom.com

Dominion

Standard Industrial Classification (SIC) Code: 4922

North American Industry Classification System (NAICS) Code: 486210

Year Business began operations: April, 1978

Year and state of incorporation: 1993, Delaware

Number of employees 98

Branch Locations: None

Headquarters or parent offices 2100 Cove Point Rd

Lusby, MD 20657

Annual sales figures for the most recent fiscal year Revenue 281.5 million

Company officials:

Dominion Cove Point, LNG, LP is operated by a general partner Dominion Cove Point LNG Company LLC. The officers for this organization are as follows:

President Gary Sypolt

Senior Vice President Diane Leopold

ATTACHMENT 12

Dominion Cove Point LNG, LP Corporate Hierarchy

Dominion Cove Point, LNG, LP

Corporate Hierarchy

Dominion Cove Point LNG, LP is operated by a general partner Dominion LNG Company, LLC.

Dominion LNG Company, LLC is under Dominion Cove Point, Inc

Dominion Cove Point, Inc is under Dominion Resources, Inc

The officers for Dominion LNG Company LLC (The operating general partner of Dominion Cove Point LNG, LP)

President

Gary Sypolt

Senior Vice President Diane Leopold

ATTACHMENT 13

Facility Acreage Summary

Dominion Cove Point LNG, LP Facility Acreage

Using the aerial photograph provided during the meeting Total acreage:

1017.91 acres Includes the yellow and blue boundary lines

Plant industrial acreage:

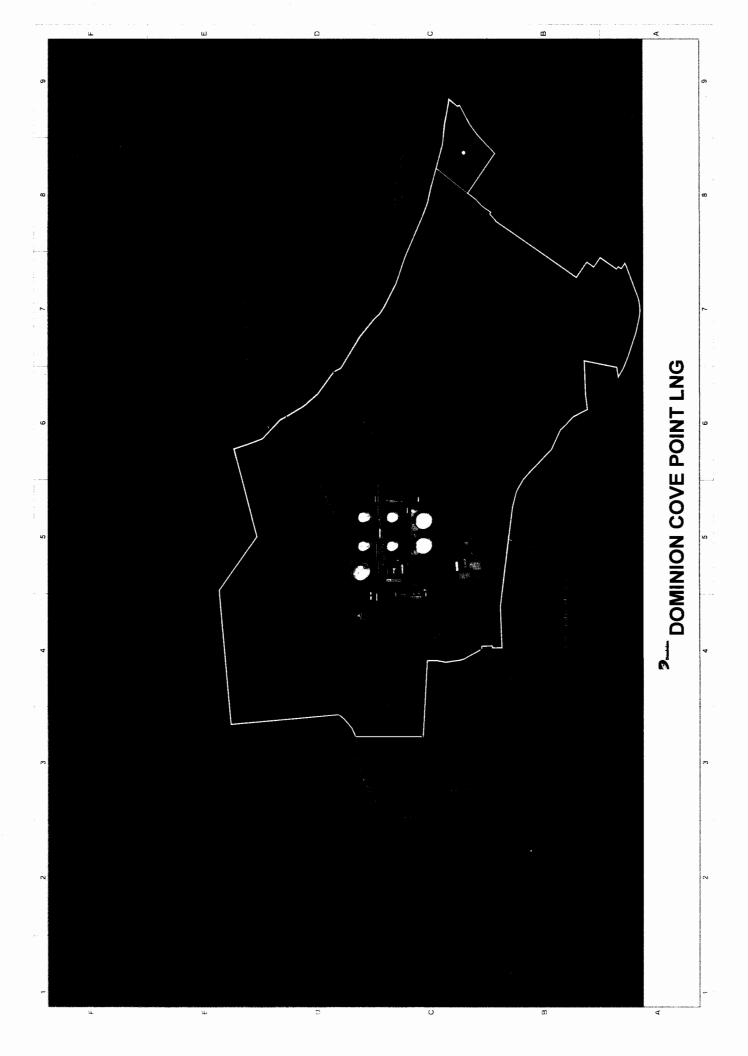
317.77 acres Includes the area within the green boundary line

Property inside fence line:

130.13 acres

ATTACHMENT 14

Facility Map



ATTACHMENT 15

July 10, 2008 EPCRA Section 302 and 303 Submission





Dominion Cove Point LNG, LP 2100 Cove Point Road, Lusby, MD 20657-4612

July 10, 2008

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7003 3110 0002 6103 9590

MDE-TARSA Community Right-to-Know Section 1800 Washington Boulevard, Suite 540 Baltimore, MD 21230-1718

RE: Dominion Cove Point LNG, LP; Emergency Planning Notification

Dear Sir or Madam:

In response to your letter of June 27, 2008, enclosed is our completed Emergency Planning Notification Form. As indicated on this form, the Cove Point LNG Terminal maintains one chemical product classified as an Extremely Hazardous Substance (EHS) above the threshold planning quantity (TPQ) under Emergency Planning and Community Right-to-Know Act (EPCRA) regulations.

As stated in our annual Tier II Emergency and Hazardous Chemical Inventory Reports submitted to you and to our Local Emergency Planning Committee (LEPC), we store sulfuric acid above the 1,000-pound TPQ. Currently, we have approximately 2,100 pounds of sulfuric acid on-site, which is contained in 584 gallons of battery acid solution. This battery acid solution is stored in dozens of sealed lead-acid batteries located throughout our 130-acre on-shore terminal site, as well as the offshore pier.

Although we do not believe that our battery acid poses any environmental or safety risk to our employees or to the community, we will gladly participate in any environmental planning deemed necessary by our Local Environmental Planning Committee, the Calvert County LEPC.

By copy of this letter, we are notifying the LEPC of the presence of this EHS. I will be the Emergency Coordinator contact for the LEPC for any additional planning and coordination that may be needed.

MDE-SSA Emergency Planning Notification July 10, 2008 Page 2

If you have any questions or need additional information, please call Jim Levin, our environmental engineer, at (410) 286-5136.

Sincerely,

Michael E. Gardner

Manager, LNG Operations

Enclosure

cc: Mr. Robert Fenwick, Director

Calvert County LEPC

C/O Calvert County Division of Emergency Management

175 Main Street

Prince Frederick, Maryland 20678

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7003 3110 0002 6103 9606

MARYLAND DEPARTMENT OF THE ENVIRONMENT COMMUNITY RIGHT-TO-KNOW SECTION SARA TITLE III - SECTION 302 **EMERGENCY PLANNING NOTIFICATION**

Facility Name: Dominion Cove Point LNG, LP							
Facility EPSC Number: 4049							
Facility Address: 2100 Cove Point Road							
City: Lusby	Zip Code: 20657-4612						
County: Calvert							
Facility Emergency Coordinator: Michael E. Gardner							
Emergency Coordinator Telephone: (410) 286-5136							
Emergency Coordinator Address (if different from facility address): N/A							

CHECK ONE:

☐ I have determined that the above facility does not have on site an Extremely Hazardous Substance as defined by SARA Title III above the threshold planning quantity and, therefore, is not subject to section 302 of the law. Thave determined that the above facility does have on site an Extremely Hazardous Substance as defined by SARA Title III, sulfuric acid, above the threshold planning quantity, and therefore is subject to section 302 of the law. In accordance with the law, the owner or operator of this facility shall: (1) inform the Local Emergency Planning Committee (LEPC) of any changes occurring at this facility that might be relevant to emergency planning; and (2) upon request of the LEPC, promptly provide to the LEPC any information necessary for development or implementation of the local emergency plan.

Manager, LNG Operations July 10, 2006

Title Date

Please return to:

MDE-SSA Community Right-To-Know Section 1800 Washington Boulevard, Suite 540 Baltimore, MD 21230 410-537-3800 And Your LEPC



Home | Help | Sign In

Track & Confirm

FAQs

Track & Confirm

Search Results Label/Receipt Number: 7003 3110 0002 6103 9590 Track & Confirm Status: Delivered Enter Label/Receipt Number. Your item was delivered at 11:30 AM on July 18, 2008 in BALTIMORE, MD 21230. Additional Details > Return to U.S. Postal Service... CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) **Notification Options** Track & Confirm by email Get current event information or updates for your item s J 5000 Certified Fee -2005. Return Reclept Fee (Endorsement Required) 3110 Restricted Delivery Fee (Endorsement Required) Site Map Contact Us Forms Govit Services Joos Total Postage & Fees Copyright@ 1999-2007 USPS. All Rights Reserved. No FEAR Act SEO D 2003 or PO Box No

SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature A. Signature A. Received by (Printed Narne) D. Is delivery address different from item 1? Yes
1. Article Addressed to: MDE-TARSA Community Right-to-Know 1800 Washington Blud. Baltimore, MD 21230-1718	If YES, enter delivery address below: LI No
Baltimore, MD21230-1718	3. Service Type
Article Number (Transfer from service label) PS Form 3811, February 2004 Domestic Re	3110 0002 5103 7590 turn Receipt 102595-02-M-1540



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FAQs

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Search Results

Label/Receipt Number: 7003 3110 0002 6103 9606

Status: Delivered

Your item was delivered at 10:50 AM on July 23, 2008 in PRINCE FREDERICK. MD 20678.

Track & Confirm Enter Label/Receipt Number.

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		Additional Details	Re C		MAIL RE	CEIPT Coverage Provided)	So >
	Notification Option	าร	L.	For delivery inform	ation visit our website	e at www.usps.com	į
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Site Mag		information or updates for ms Gov't Services Rights Reserved. No Fi	or your	Postage Certified Fee Return Reciept Fee (Endoisement Required) Restricted Delivery Fee (Endoisement Required) Total Postage & Fees		JUL 1 pozim2008 Here	
oopyngm	G 1000 2001 G . Am			Street, Apr. No.; or PO Box No. /	bert Fenw. 15 Main 16 Frederi	ck, Calvert Cou St. LER Ck, MD 20678	1

SENDER: COMPLETE THIS SEC	TION	COMPLETE TH	IS SECTION ON DELIVE	RY
 Complete items 1, 2, and 3, Alsitem 4 if Restricted Delivery is d Print your name and address on so that we can return the card to a Attach this card to the back of tor on the front if space permits. 	esired, the reverse byou.	LYS5G	MOHOL	Agent Addressee Pate of Delivery
Article Addressed to:		dress different from item 1° d-1° mry address below:	? 🗌 Yes .	
Mr. Robert Fenwi	e.k			
Calvert Co. LE	PC			
175 Main St.		3. Service Type		
Prince Frederick,	MD20678	Certified N Registered Insured M	i Liturn Puceipt	for Merchandise
		4. Restricted De	elivery? (Extra Fee)	☐ Yes
Article Number (Transfer from service lat	7003 3110	1 0005 FJ	03 9506	
PS Form 3811, February 2004	Domestic Ret	urn Receipt		102595-02-M-1540

ATTACHMENT 16

December 15, 2012 through February 17, 2013 Ammonia Slip Data Report Summary

Data Summary Report

Company:

Cove Point LNG, L.P.

2100 Cove Point Road

Lusby, MD 20657

Data Group:

All Data Groups

Report Name:

~ Tubine Daily NH3 Totals

Start of Report:

12/15/2012 00:00

End of Report:

02/17/2013 23:59



Environmental Systems, Inc.

Validation: All Available Data

Group#-Channel#	G9-C2	G22-C2	G35-C2	G59-C2	G69-C2	G84-C2	
Long Descrip.	111JA - N	111JB - N	111JC - N	214JA - N	214JB - N	311J - NH	
Short Descrip.	3A-NH3mas	3BNH3mass	3C-NH3mas	5A-NH3mas	5B-NH3mas	S-NH3mass	
Units	1bs/day	1bs/day	1bs/day	lbs/day	lbs/day	1bs/day	
Range	0-1000	0-1000	0-1000	0-1000	0-1000	0-1000	
12/15/2012 00:00	0.0	35.0	0.0	5.8	0.3	0.0	
12/16/2012 00:00	0.0	43.0	0.0	4.7	0.0	0.0	
12/17/2012 00:00	53.0	21.6	0.0	4.6	0.0	0.0	
12/18/2012 00:00	107.8	0.0	0.0	5.1	0.0	0.0	
12/19/2012 00:00	89.9	0.0	0.0	2.9	0.3	0.0	
12/20/2012 00:00	107.1	0.0	0.0	2.4	0.0	0.0	
12/21/2012 00:00	90.6	0.0	0.0	4.7	0.0	0.0	
12/22/2012 00:00	72.9	0.0	0.0	3.9	0.0	0.0	
12/23/2012 00:00	68.1	0.0	210.7	5.2	0.0	0.0	
12/24/2012 00:00	0.0	0.0	169.7	4.5	0.0	0.0	
12/25/2012 00:00	0.0	0.0	162.7	4.2	0.0	0.0	
12/26/2012 00:00	0.0	0.0	132.6	5.1	0.0	0.0	
12/27/2012 00:00	0.0	0.0	136.6	4.1	0.0	0.0	
12/28/2012 00:00	13.4	0.0	285.1	3.7	2.6	0.0	
12/29/2012 00:00	0.0	0.0	0.0	0.0	0.0	0.0	
12/30/2012 00:00	31.5	0.0	137.4	0.0	3.3	0.0	
12/31/2012 00:00	20.8	0.0	186.8	0.0	9.9	0.0	
01/01/2013 00:00	0.0	0.0	203.2	0.0	0.0	0.0	
01/02/2013 00:00	0.0	0.0	170.2	0.0	0.0	0.0	
01/03/2013 00:00	0.0	0.0	97.3	0.0	0.0	0.0	
01/04/2013 00:00	0.0	0.0	119.8	0.0	0.0	0.0	
01/05/2013 00:00	0.0	0.0	185.9	0.0	0.0	0.0	
01/06/2013 00:00	0.0	0.0	188.7	0.0	0.0	0.0	
01/07/2013 00:00	0.0	0.0	139.9	0.0	0.0	0.0	
01/08/2013 00:00	0.0	0.0	118.7	0.0	0.0	0.0	
01/09/2013 00:00	0.0	0.0	131.1	0.0	0.0	0.0	
01/10/2013 00:00	0.0	0.0	150.4	0.0	0.0	0.0	
01/11/2013 00:00	0.0	0.0	148.8	0.0	0.0	0.0	
01/12/2013 00:00	0.0	0.0	238.2	0.0	0.0	0.0	
01/13/2013 00:00	60.1	0.0	66.7	0.0	0.0	0.0	
01/14/2013 00:00	99.5	0.0	0.0	0.0	0.0	0.0	
01/15/2013 00:00	65.0	0.0	0.0	0.0	0.0	0.0	
01/16/2013 00:00	99.0	0.0	0.0	0.0	0.0	0.0	
01/17/2013 00:00	81.6	21.0	0,0	0.0	0.0	0.0	
01/18/2013 00:00	69.1	52.0	0.0	0.0	0.0	0.0	
01/19/2013 00:00	113.5	91.8	0.0	0.0	0.6	0.0	
01/20/2013 00:00	161.8	135.0	0.0	0.0	0.6	0.0	
01/21/2013 00:00	113.7	114.9	0.0	0.0	0.5	0.0	
01/22/2013 00:00	75.7	103.8	0.0	0.0	0.0	0.0	
01/23/2013 00:00	71.2	101.2	0.0	0.0	0.4	0.0	
01/24/2013 00:00	59.0	82.2	0.0	2.2	0.1	20.6	•

Group#-Channel#	G9-C2	G22-C2	G35-C2	G59-C2	G69-C2	G84-C2	
Long Descrip.	111JA - N	111JB - N	111JC - N	214JA - N	214JB - N	311J - NH	
Short Descrip.	3A-NH3mas	3BNH3mass	3C-NH3mas	5A-NH3mas	5B-NH3mas	S-NH3mass	
Units	lbs/day	lbs/day	lbs/day	1bs/day	lbs/day	1bs/day	
Range	0-1000	0-1000	0-1000	0-1000	0-1000	0-1000	
01/25/2013 00:00	53.8	70.7	0.0	4.8	0.0	41.9	
01/26/2013 00:00	65.2	68.1	0.0	4.0	0.0	39.3	
01/27/2013 00:00	65.2	38.1	0.0	. 0.0	0.0	40.5	
01/28/2013 00:00	81.2	65.4	0.0	0.0	0.0	34.5	
01/29/2013 00:00	111.7	75.5	0.0	0.0	0.0	30.1	
01/30/2013 00:00	130.7	92.2	0.0	6.4	0.0	0.0	
01/31/2013 00:00	103.9	100.8	0.0	6.6	0.0	0.0	
02/01/2013 00:00	75.8	103.4	0.0	6.6	0.0	0.0	
02/02/2013 00:00	69.1	92.0	0.0	6.0	0.0	0.0	
02/03/2013 00:00	29.6	42.7	0.0	2.0	0.0	0.0	
02/04/2013 00:00	57.6	51.6	0.0	1.8	5.3	0.0	
02/05/2013 00:00	76.8	0.0	0.0	0.0	0.0	0.0	
02/06/2013 00:00	71.9	0.0	0.0	0.0	0.0	0.0	
02/07/2013 00:00	71.1	0.0	0.0	0.0	0.0	0.0	
02/08/2013 00:00	59.2	0.0	0.0	0.0	0.0	0.0	
02/09/2013 00:00	64.0	0.0	0.0	0.0	0.0	0.0	
02/10/2013 00:00	72.1	0.0	0.0	0.0	0.0	0.0	
02/11/2013 00:00	101.3	0.0	0.0	0.0	0.0	0.0	
02/12/2013 00:00	97.4	0.0	0.0	0.0	0.0	0.0	
02/13/2013 00:00	72.7	0.0	0.0	0.0	0.0	0.0	
02/14/2013 00:00	24.7	0.0	0.0	0.0	5.9	9.4	
02/15/2013 00:00	0.0	0.0	0.0	0.0	6.8	44.5	
02/16/2013 00:00	0.0	C.0	. 0.0	C.O	10.6	50.0	
02/17/2013 00:00	0.0	0.0	0.0	0.0	11.3	45.3	
Period Average =	50.5	24.6	52.0	1.6	0.9	5.5	
Period Max Value =	161.8	135.0	285.1	6.6	11.3	50.0	
Period Min Value =	0.0	0.0	0.0	0.0	0.0	0.0	
Period Totals =	3.2793E+3 1	.6020E÷3 3	3.3805E+3]	0130E+2 5	5.8500E+1 3	3.5610E+2	
Period % Recovery =	100.0	100.0	100.0	100.0	100.0	100.0	

ATTACHMENT 17

Ammonia Slip Calculations

Cove Point LNG LP Ammonia Slip Calculations - GE Frame 3 GTG's NH3Mass - A * B * C (Lbs) A - NH3Rate B - MMTBU C - Hour Run Pctg NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU) A - NH3 Slip B - Const C - O2 Outlet NH3 Slip - A - (B - C) (ppm) A - InHN3 B - NOxIN C - NOxOut InNH3 - A * B * C * D / (E / 1000) (ppm) A - NH3 GPH B - NH3 SpecGrav C - NH3 % D - Conv Const E - Stack Flow Stack Flow - A * B * (20.9 / ((20.9 - C) / 1000)) (kscfh/hr A - Const B - MMBTU (FF * BTU)/1000000 C - O2 Outlet MMBTU - (A * B) / 1000 (MMBTU) A - Fuel Flow MSCFH

B - Fuel BTU

	Cove Point LNG LP	
	GE Frame 5 GTG's	
NH3Mass - A * B * C (lbs)		

- A NH3Rate
- B MMTBU
- C Hour Run Pctg

NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU)

- A NH3 Slip
- B Const
- C Q2 Outlet

NH3 Slip - A - B (ppm)

- A ANOx
- B-NOx

MMBTU - (A * B) / 1000 (MMBTU)

- A Fuel Flow MSCFH
- B Fuel BTU

Cove Point LNG LP Solar GTG NH3Mass - A * B * C (lbs) A - NH3Rate **B-MMTBU** C - Hour Run Pctg NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU) A - NH3 Slip 8710 B - Const C - O2 Outlet NH3 Slip - A - (B - C) (ppm) A - InHN3 B - NOxIN C - NOxOut InNH3 - ((A * (B / 100) * (10.73 * 530) / 17.03) / 14.7) / (C * 1000) * 1000000 (ppm) A - NH3 lbs/hr C - NH3 % 19 E - Stack Flow Stack Flow - A * B * (20.9 / ((20.9 - C) / 1000)) (kscf/hr) 8710 A - Const B - MMBTU (FF * BTU)/1000000 C - O2 Outlet %

MMBTU - (A * B) / 1000 (MMBTU)

A - Fuel Flow MSCFH

B - Fuel BTU

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 18

July 15, 2013 Response to an Additional Information Request

Dominion Cove Point LNG, LP Responses to EPA's follow up questions regarding Continuous Release Report for ammonia (CR-ERNS 1038884) 7/15/13

1. After December 15, 2012 was the ammonia slip data received and reviewed daily? If not at what frequency was the ammonia slip data received and reviewed?

During the period from December 15, 2012 to February 19, 2013 (the date the telephone notification of the continuous release of ammonia was made), data from the CEMS was available electronically on a daily basis and reviewed at least weekly if not more often. After CEMS data showed numbers above the 100 lb/day threshold, we immediately began evaluating the accuracy of the input data for the ammonia slip calculations. As there was no physical evidence that tended to support this initial ammonia slip data, we focused during this time on validating the input data.

2. Provide a timeline for the work performed to verify that the ammonia slip data was accurate.

Oct 2012 – Facility self-assessment determined that monitors could provide data for calculation of ammonia slip. Dominion initiated request for assistance from CEMS vendor.

Dec 2, 2012 -- Cove Point's vendor discovered an ammonia reagent flow rate problem. The signal range of the ammonia reagent flow meter did not match the signal range of the CEMS data acquisition handling system (DAHS) logic controller. Because the signal range mismatch causes the DAHS to assign a different ammonia reagent flow value into the ammonia slip equation other than what the flow meter is actually measuring, this resulted in the calculation of an incorrect ammonia slip value.

Dec 9–13, 2012 -- Cove Point's DAHS program vendor verified the ammonia reagent flow signal values and matched the DAHS input signal to the ammonia reagent flow meter output signal and then verified the ammonia slip calculations.

Dec 15, 2012 – Flow monitor inputs tied back into DAHS. Cove Point staff then began evaluating precision and accuracy of ammonia slip calculations. Without any physical evidence of an ammonia release by either visual or odor observations, questions remained throughout the ensuing weeks regarding the presence or magnitude of ammonia slip releases and the meaning of the data.

Dec 30, 2012 -- A flow span upper range limit in the DAHS ammonia slip calculation was discovered to be limiting the ammonia slip values. The limit in the calculation was removed and the slip numbers were recalculated.

Jan 3 - Feb 19, 2013 – Cove Point staff worked with Dominion Virginia Power's Fossil and Hydro Emission Monitoring Support Group (EMSG) to evaluate input data for potential errors. This included review of aqueous ammonia flow, verification of the inlet NOx certification, review of frame 3 turbines SCR install records, and review of the ammonia calculations.

3. On what date and time was it apparent to the facility that the ammonia slip data was accurate and a release of ammonia from the SCRs was periodically occurring above the one hundred pound threshold?

In the afternoon of February 19, 2013.

4. Does Dominion Resources, Inc. (or a subsidiary) operate a facility in EPA Region 3 that reports a continuous release of ammonia from a NOx reduction source? If so please provide the facility name and Continuous Release – Emergency Response Notification System (CR-ERNS) number for the releasing facilities.

The following Dominion Virginia Power facilities provided initial notifications for continuous releases of ammonia from NOx control SCRs in 2004:

Mt. Storm Power Station (WV), Units 1, 2, 3; CR-ERNS No. 625548, June 17, 2004 Chesapeake Energy Center (VA), Units 1, 2, 3, 4; CR-ERNS No. 625614, June 17, 2004 Clover Power Station (VA), Units 1, 2; CR-ERNS No. 725418, June 18, 2004 Possum Point Power Station (VA), Units 6A, 6B, CR-ERNS No. 625594, July 15, 2004

In 2005, annual follow up reports were submitted for the Chesapeake Energy Center and the Possum Point Power Station. Dominion Virginia Power withdrew its continuous release reports for Mt. Storm Power Station and Clover Power Station because it was later determined that wet scrubbers used for sulfur dioxide control at these facilities absorbed ammonia such that slip emissions were deemed well below the 100 lb reporting threshold. Ammonia captured by the scrubbers is eventually discharged pursuant to Clover's and Mt. Storm's NPDES permits.

5. Please provide a written methodology and formulas used to perform the ammonia slip release calculations from the data that was received from December 15, 2012 through February 17, 2013. Please include what inputs were fixed (i.e. the facility has knowledge immediately) and which inputs were variable (i.e. fluctuated and the facility needed to determine hard data before proceeding).

The ammonia slip calculation formulas are provided in Attachments 1, 2 and 3. The inputs to these formulas are automatic from the CEMS analyzers and the plant distributed control system (DCS). As noted above in our response to question 2, however, there were concerns about the accuracy of some the variable inputs. The constants and variables to the ammonia slip formulas are as follows:

Constants (Fixed)

Aqueous Ammonia NH3 percentage – 19.0%, Standard constants for natural gas combustion.

Variables

Fuel BTU content Fuel flow Catalyst Inlet NOx Catalyst Outlet NOx Outlet O2 Aqueous Ammonia Flow 6. Please provide a written methodology and formulas used to perform the ammonia slip release calculations to determine the upper limit boundary for each of the six (6) SCRs.

The upper limit boundary for each turbine was calculated using the 2012 Calendar Year hourly average data from the facility's software (PI historian database). Daily and maximum ammonia slip values were then calculated in Excel using the DAHS ammonia slip formulas in Attachments 1, 2 and 3.

Cove Point LNG LP	
Ammonia Slip Calculations - GE Frame 3 111Js GTG's	
NH3Mass - A * B * C (Lbs)	
A - NH3Rate	
B - MMTBU	
C - Hour Run Pctg	
NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU)	
A - NH3 Slip	
B - Const	8710
C - O2 Outlet	
NH3 Slip - A - (B - C) (ppm)	
A - InHN3	
B - NOxIN	
C - NOxOut	
<u>InNH3 - A * B * C * D / (E / 1000) (ppm)</u>	
A - NH3 GPH	
B - NH3 SpecGrav	0.93
C - NH3 %	19
D - Conv Const	1.887
E - Stack Flow	•
Stack Flow - A * B * (20.9 / ((20.9 - C) / 1000)) (kscfh/hr)	8710
A - Const	8/10
B - MMBTU (FF * BTU)/1000000 C - O2 Outlet	
G - O2 Outlet	
MMBTU - (A * B) / 1000 (MMBTU)	
A - Fuel Flow MSCFH	
B - Fuel BTU	
10.10.0.0	

Cove Point LNG LP GE Frame 5 214Js GTG's

NH3Mass - A * B * C (lbs)

- A NH3Rate
- B MMTBU
- C Hour Run Pctg

NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU)

- A NH3 Slip
- B Const

C - O2 Outlet

8710

NH3 Slip - A - B (ppm)

- A ANOx
- B NOx

MMBTU - (A * B) / 1000 (MMBTU)

- A Fuel Flow MSCFH
- B Fuel BTU

Cove Point LNG LP Solar 311J GTG **NH3Mass** - A * B * C (lbs) A - NH3Rate B - MMTBU C - Hour Run Pctg NH3Rate - (0.4419/10000000) * A * B * (20.9/(20.9 - C)) (lbs/MMBTU) A - NH3 Slip B - Const 8710 C - O2 Outlet **NH3 Slip** - A - (B - C) (ppm) A - InHN3 **B** - NOxIN C - NOxOut InNH3 - ((A * (B / 100) * (10.73 * 530) / 17.03) / 14.7) / (C * 1000) * 1000000 (ppm) A - NH3 lbs/hr C - NH3 % 19 E - Stack Flow **Stack Flow** - A * B * (20.9 / ((20.9 - C) / 1000)) (kscf/hr) A - Const 8710 B - MMBTU (FF * BTU)/1000000 C - O2 Outlet %

MMBTU - (A * B) / 1000 (MMBTU)

A - Fuel Flow MSCFH

B - Fuel BTU

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 19

February 19, 2013 Initial Continuous Release Notification Report

Paul E Dickson (Services - 6)

From: Sent:

HQS-PF-fldr-NRC@USCG.MIL Friday, March 01, 2013 11:57 AM

To:

Paul E Dickson (Services - 6)

Subject:

NRC#1038884

NATIONAL RESPONSE CENTER 1-800-424-8802

*** For Public Use ***

Information released to a third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1038884

INCIDENT DESCRIPTION

*Report taken at 15:37 on 19-FEB-13

Incident Type: CONTINUOUS
Incident Cause: OTHER

Affected Area:

Incident occurred on 19-FEB-13 at 15:34 local incident time.

SUSPECTED RESPONSIBLE PARTY

Organization: DOMINION COVE POINT LNG LP

LUSBY, MD 20657

INCIDENT LOCATION

2100 COVE POINT RD County: CALVER' City: LUSBY State: MD Zip: 20657

DOMINION COVE POINT LNG LP

RELEASED MATERIAL(S)

DESCRIPTION OF INCIDENT

CALLER STATED THAT THE FACILITY HAS COMBUSTION TURBINES THAT HAVE SCR'S AND THE SCR'S UTILIZE AQUEOUS AMMONIA INJECTION. THIS IS A CONTINUOUS RELEASE REPORT FOR THE AMMONIA IN THE PROCESS. THEY HAVE 3 UNITS THAT ARE SUBJECT TO THIS REGULATION AND THE FIRST ONE PRODUCES 161.8 POUNDS IN 24 HOURS. THE SECOND ONE PRODUCES 135 POUNDS IN 24 HOURS AND THE THIRD ONE PRODUCES 285.1 POUNDS IN 24 HOURS.

INCIDENT DETAILS

Building ID: DOMINION

Type of Fixed Object: OTHER Power Generating Facility: YES

Generating Capacity: Type of Fuel: NATURAL

NPDES:

NPDES Compliance: YES

Continuous Release Type: INITIAL

Initial Continuous Release Number: 1038884

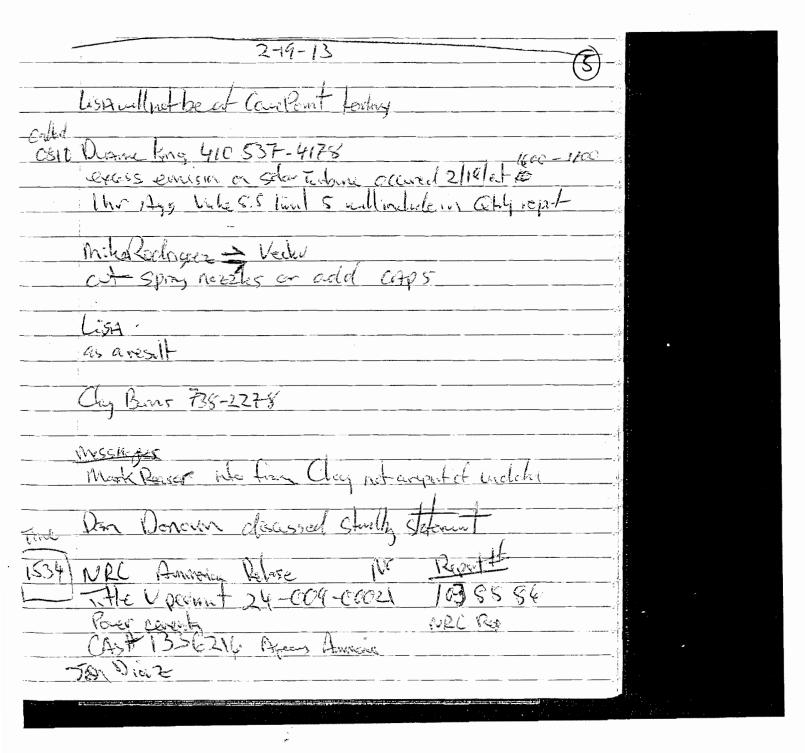
Continuous Release Permit: 2400900021		
IMPACT Fire Involved: UNKNOWN Fire Extinguish	ed: UNKNOWN	
INJURIES: UNKNOWN Hospitalized: FATALITIES: UNKNOWN Empl/Crew: EVACUATIONS:UNKNOWN Who Evacuated:	Empl/Crew: Passenger: Radius/	
Damages: UNKNOWN	House	Direction of
Closure Type Description of Closure	Hours Closed	Direction of Closure
Air:		
Road:		Major Artery:
Waterway:		
Track:		
Environmental Impact: UNKNOWN Media Interest: NONE Community Impact d	lue to Material	l:
REMEDIAL ACTIO)NS	
Estimated Release Duration: WEATHER		
ADDITIONAL AGENCIES	NOTTETED	
Federal: State/Local: State/Local On Scene: State Agency Number:		
NOTIFICATIONS BY	NRC	
U.S. EPA III (MAIN OFFICE) 19-FEB-13 16:11 OTHER UNIT (MAIN OFFICE) 01-MAR-13 11:56		
ADDITIONAL INFORM	MATION	
CONTINUOUS RELEASE MA	TERIAL	
CHRIS Code: AHM Official Material Nam Also Known As: Upper Bounds: 161.8 POUND(S)/DAY	ne: AMMONIUM HY	/DROXIDE

*** END INCIDENT REPORT #1038884 ***
Report any problems by calling 1-800-424-8802
PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 20

Continuous Release Initial Notification Notes



₩.	
	Poricen bulliany 410-537-3800
	receted Quality lenewh
	reported Quality Ineach 30 day leter
	mai Arma or
	aracle Start obligation
	Could EPC 410-535-1623
	Country LEPE 410-535-1625 Al Jeffrey Report Rody NRC Report
1600	Robert Limed 410-517-3600
g etyr to the	notion
	Cley Barns 738 2276
1640	Rain USCE, Reavon USCE Baltaran
	Called about release expline to be what has beginn
James and the second se	

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 21

Average Stack Flow and Temperatures

Paul E Dickson (Services - 6)

From:

David S Mellinger (Energy - 2T)

Sent:

Saturday, March 02, 2013 1:11 PM

To: Subject: Paul E Dickson (Services - 6) RE: ammonia info more

Stack flow / stack outlet temps:

	Stack Flow (KSCFH)	Temperature (deg F)
111JA	4982	820
111JB	4998	774
111JC	4959	843
214JA	6853	750
214JB	6747	750
311J	4718	650

From: Paul E Dickson (Services - 6)
Sent: Friday, March 01, 2013 4:40 PM
To: David S Mellinger (Energy - 2T)
Subject: ammonia info more

Can you provide the average stack flow and temperature for each unit. The info you sent Jim

Paul E Dickson, Jr CIH Environmental Consultant Dominion Cove Point, LNG 2100 Cove Point Road Lusby, MD 20657 Paul.E.Dickson@dom.com Tie 8-758-5136 410 286-5136 (w) 757 536-2156(c) Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 22

Upper Bound Limit Calculation Results Summary

T	111JA	111JB	111JC	214JA	214JB	311J
Maximum	214.3	137.8	687.2	22.6	41.4	59.1
Median	109.7	67.7	306.1	2.9	4.7	27.6
Mode	117.5	80.0	377.5	1.6	. 4.7	25.0
Average	112.6	57.5	301.8	4.1	7.2	29.5

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 23

March 18, 2013 Thirty (30) Day Initial Written Continuous Release Notification Report



Dominion Resources Services, Inc. 5000 Dominion Boulevard, Glen Allen, VA 23060

Web Address: www.dom.com



March 18, 2013

BY UPS NEXT DAY AIR

1Z06W3A20197724771 USEPA, Region 3 (3HW-30) CR-ERNS Coordinator Superfund Removal Branch 841 Chestnut Building Philadelphia, PA 19107

1Z06W3A20198837399
Patricia Williams
MDE-SSA -Community Right to Know
1800 Washington Blvd, Suite 540
Baltimore, MD 21230

1Z06W3A20197724771 Mr. Robert Fenwick, Director Calvert County LEPC C/O Calvert County Emergency Management Division 175 Main Street, Courthouse Prince Frederick, Maryland 20678

RE: <u>Dominion Cove Point LNG, LP: CR-ERNS 1038884 Initial Continuous Release</u> Report

Dear Sir or Madam:

Pursuant to EPA Regulations at 40 CFR 302.8 (CERCLA) and 40 CFR 355.40 (EPCRA) for continuous release reporting of substances that are not federally permitted, Dominion Cove Point LNG, LP ("Dominion") is submitting the required follow-up initial written notification for CR-ERNS No.1038884. Dominion made an initial telephone notification to the National Response Center, the State Emergency Response Commission and the Local Emergency Planning Committees on February 19, 2013, for a continuous release of ammonia from the Dominion Cove Point LNG facility in Lusby, Maryland. This submittal meets the requirement to submit an initial written notification within 30 days of the telephone notification.

As explained below and in the attached report, the release is not an accidental emergency release, but is generally continuous and stable in quantity and rate as defined in 40 CFR 302.8(a) and (b) and 40 CFR 355(a)(2)(iii).

March 18, 2013 Page 2_ CR-ERNS 1038884

The Dominion Cove Point LNG facility employs six simple-cycle natural gas turbines for electric generation. Each turbine is equipped with a selective catalytic reduction (SCR) system, which requires injection of ammonia to reduce NOx emissions. As part of a facility self assessment conducted in October 2012, facility staff recognized that emission and flow monitors were in place on each turbine system that could provide data for the calculation of unreacted ammonia (ammonia slip) from the SCRs. (Ammonia slip emissions from the facility are not subject to permit limits or other regulatory controls.) On December 15, 2012, these monitor inputs were tied into the facility's CEMS data acquisition and handling system (DAHS). During the next several weeks, Dominion personnel evaluated the monitoring systems to verify the accuracy and precision of the ammonia slip emissions calculated by the DAHS. On February 19, 2013, Dominion made an initial telephone notification for a continuous release of ammonia, based on the data compiled from the facility's CEMS DAHS since December 15, 2012. That notification included the highest calculated release amounts of ammonia slip during the December-February time period for the three turbines where releases exceeded the RQ of 100 lbs/24 hours.

Attached is Dominion's 30-day continuous release report for ammonia releases from the Cove Point LNG facility. The data provided in section IIC of this report is derived from 2012 historical monitor data collected outside of the facility's CEMS DAHS system. Based on best professional judgment, this data is considered representative. Information for all six turbines is provided in the report, including the actual number of operational days and total calculated ammonia slip emissions from each turbine during 2012. The upper bound limits for each turbine represent the highest calculated value for an operational day during 2012. Accordingly, the statistically significant increase (SSI) trigger identified in section III is the calculated sum of the upper bounds from four of the six operating turbines, which represents the highest expected 24-hour operating scenario for the turbines.

Dominion is undertaking a proactive program to evaluate ammonia slip emissions from the facility and to determine ways to improve the reaction efficiency of the ammonia in the SCR systems. A catalyst evaluation program is currently in place to determine the life span and reactive capability of the catalyst. The facility is also initiating efforts to trend the ammonia slip from each unit to determine when ammonia reagent injection tuning would be beneficial. Dominion has increased awareness of operational changes that may impact the SCRs.

March 18, 2013
Page 3
CR-ERNS 1038884

If you have any questions or require additional information, please contact Paul Dickson at (410) 286-5136 or paul.e.dickson@dom.com.

Sincerely,

Lisa C. Moerner

Kina C. Muzzacia

Director, Environmental Sustainability and Gas Environmental Services

Enclosures (1)

cc: Paul Dickson

ebc: Pam Faggert Bill Wilkinson

Mark Reaser Michael Gardner Jasmine Scheuring

File: Compliance Reporting/ EPCRA Extremely hazardous Substance Notifications / Dominion Cove Point

Continuous Release Reporting Form

SECTION I: GENEI INFOR	RAL MATIC)N	CR-ERNS	Number: 1038884
Date of Initial Release: 02/19/2013			Date of Initia	al Call to NRC: 02/19/2013
•		ort that you In	itial written noti	fication
and rate under the definition best of my knowledge.	ons in 40 C.	the hazardous substance FR 302.8(b) or 355.32 a	nd that all submitte	herein are continuous and stable in quantity d information is accurate and current to the Signature MARGARY
Part A. Facility or V		ormation Dominion Cove	Point LNG, LP	
Person in Charge	Nam			ition Director LNG Operations
of Facility or Vessel	Phone Nu	mber 410 286 513	Alt Phon	e No. 443 684 4492
Facility Address or Vessel Port of	Street	2100 Cove Point	Rd	County
Registration	City	Lusby Sta	tte MD Zip Code	20657
Dun and Bradstre	et Numbe	er for Facility 116	025180	
Facility/Vessel Location	Latitude	Deg 38 Min 23	Sec 3.6	Vessel LORAN Coordinates
	Longitude	Deg [-76] Min 24	Sec 37.9	
NOTE: Latitude/Longitude in and http://www.census.gov/gt	iformation can go/landview/.	t be obtained at the following v Do not use P.O. Box, Rural Re	vebsites: http://www.sats ine or Mailing Address.	sig.net/maps/lat-long-finder.htm/http://earth.google.com/. Use physical location only.
Part B. Population I	nformati	on		ON COMMITTEE AND A SECURE AND ASSESSMENT AS
Population Density	describe	om the drop-down l s the population den ius of your facility o	sity within a one	More than 1000
Sensitive Populations and	(e.g., elem	sitive Populations of entary schools, hospitals, re or wetlands)		Estimated Distance and Direction from Facility, if Known
Ecosystems within One-Mile Radius	See at	tached sheet table	1	See attached sheet table 1

Sensitive Populations and Ecosystems within One-Mile Radius

Dominion Cove Point LNG, LP 2100 Cove Point Road Lusby MD 20657 CR-ERNS Number 1038884
Continuous Release Report
Initial written notice

Table 1

Area Name	Direction from Facility	Distance from Facility
Webster Ponds	South /South East	.1 mile
Wilbur Pond	East	.1 mile
Cove Point Park	West	.75 mile
Lake Lariat	South /South West	1 mile
Calvert State Cliffs Parks	North /North West	1 mile

No sensitive populations such as elementary schools, hospitals, retirement homes identified within a 1 mile radius of the facility.

Continuous Release Reporting Form

ECTION II: SOURCE INFORMATION	CR-ERNS Number:	1038884
Part A: Basis for Asserting the Release is Continuo For EACH source of a release of a hazardous substant the following information on a SEPARATE sheet.		
Name of Source: Turbine 111JA		
1. Indicate whether the release from this source is either:		
Continuous without interruption OR	routine, anticipated normal operations of	, intermittent & incidental to or treatment processes.
Note that unanticipated events, such as spills, pipe rup accidents, do not qualify for reduced reporting under (not incidental to normal operations and, by definition, aufficiently predictable or regular to be considered sta	CERCLA section 103(f)(2). are not continuous or antic	Unanticipated events are
2. Provide a brief statement describing the basis for static If malfunction, describe the malfunction and explain v continuous and stable in quantity and rate given the no	vhy the release from the malfund	
This turbine utilizes selective catalytic reduction (SCR) to corammonia as the reagent for the NOx reduction reaction. Inhunreacted and leaves the exhaust stack as ammonia. This ar For each turbine the SCR is put into service promptly after stoperational temperatures. The SCR remains in service while turbine load and are automatically adjusted in response to t turbine with SCR, ammonia slip will occur. Factors that influand the magnitude and number of load changes. The number of each is directly related to the power demands of the facili Based on the operations of the SCR during turbine operation routine, anticipated, and intermittent.	nerent to the process, some of the mmonia is called ammonia slip. I cart up when catalyst temperaturate the turbine is operating. Ammone stack outlet NOx analyzer. Dence the amount of slip are the per of turbines in operation and ty.	ne injected ammonia remains ares reach the required onia injection rates vary with auring the operation of the operating load of the unit the electrical generation rate
3. Identify below how you established the pattern or rele		
Release data	d from turbine NOx emission an chromatographs. As of Decem	s were determined by lalyzers, ammonia

SECTION II: SOURCE INFORMATION	CR-ERNS Number: 1038884
Part A: Basis for Asserting the Release is Continuous For EACH source of a release of a hazardous substathe following information on a SEPARATE sheet.	
Name of Source: Turbine 111J8	
1. Indicate whether the release from this source is either	
Continuous without interruption OR	routine, anticipated, intermittent & incidental to normal operations or treatment processes.
	CERCLA section 103(f)(2). Unanticipated events are are not continuous or anticipated, and are not able in quantity and rate. In the release is continuous and stable in quantity and rate.
This turbine utilizes selective catalytic reduction (SCR) to columnonia as the reagent for the NOx reduction reaction. Influence and leaves the exhaust stack as ammonia. This a for each turbine the SCR is put into service promptly after stoperational temperatures. The SCR remains in service while turbine load and are automatically adjusted in response to turbine with SCR, ammonia slip will occur. Factors that influence the magnitude and number of load changes. The number of each is directly related to the power demands of the facility.	ntrol emissions of NOx. This process utilizes injected aqueous neerent to the process, some of the injected ammonia remains mmonia is called ammonia slip. tart up when catalyst temperatures reach the required the turbine is operating. Ammonia injection rates vary with the stack outlet NOx analyzer. During the operation of the stack outlet NOx analyzer of turbines in operation and the electrical generation rate
3. Identify below how you established the pattern or rele Release data Knowledge of Operating Procedures	ease and calculated release estimates. Engineering estimate 🗵 Best Professional judgment
	d from turbine NOx emission analyzers, ammonia schromatographs. As of December15, 2012 this data

Continuous Release Reporting Form

ECTION II: SOUF INFOI	RCE RMATION		CR-ERNS Number: 1038884
For EACH source of a	release of a hazard	ous substan	is and Stable in Quantity and Rate. ce or mixture from your facility or vessel, provide
ne following informati	on on a SEPARATI	E sheet.	
Name of Source:	Turbine 111JC		· · · · · · · · · · · · · · · · · · ·
Indicate whether	the release from this sou	urce is either:	
Continuous witho	ut interruption	OR	routine, anticipated, intermittent & incidental to normal operations or treatment processes.
accidents, do not qualij not incidental to norma rufficiently predictable	fy for reduced report Il operations and, by or regular to be con	ting under C definition, d	ures, equipment failures, emergency shutdowns, or ERCLA section 103(f)(2). Unanticipated events are are not continuous or anticipated, and are not le in quantity and rate.
If malfunction, o	tatement describing the bescribe the malfunction stable in quantity and rate	and explain wh	g that the release is continuous and stable in quantity and rate. ny the release from the malfunction should be considered e above.
If malfunction, of continuous and second formula and second formula as the reagen unreacted and leaves the for each turbine the SC operational temperature turbine load and are auturbine with SCR, ammond the magnitude and of each is directly related	escribe the malfunction stable in quantity and rate ective catalytic reduction to the NOx reduction are exhaust stack as amm is put into service protes. The SCR remains in a tomatically adjusted in a pair slip will occur. Fact a number of load changed to the power demands of the SCR during turb	and explain whe given the not not continued in (SCR) to continue reaction. Inherencia, This amount of the service while the response to the tors that influe es. The number of the facility oine operations	rol emissions of NOx. This process utilizes injected aqueous erent to the process, some of the injected ammonia remains monia is called ammonia slip. It up when catalyst temperatures reach the required the turbine is operating. Ammonia injection rates vary with e stack outlet NOx analyzer. During the operation of the nice the amount of slip are the operating load of the unit er of turbines in operation and the electrical generation rate
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If malfunction, of continuous and secontinuous and secontinuous and secontinuous and second and as the reagen unreacted and leaves the for each turbine the SC operational temperature turbine load and are auturbine with SCR, ammond the magnitude and of each is directly related Based on the operation routine, anticipated, and Identify below the second and second	escribe the malfunction stable in quantity and rate ective catalytic reduction to the NOx reduction are exhaust stack as amm R is put into service protes. The SCR remains in stomatically adjusted in the power demand to the power demand s of the SCR during turb d intermittent.	and explain whe given the not reaction. Inher nonia. This am mptly after sta service while tresponse to the tors that influe es. The number of the facility bine operations pattern or release	rol emissions of NOx. This process utilizes injected aqueous erent to the process, some of the injected ammonia remains monia is called ammonia slip. It up when catalyst temperatures reach the required he turbine is operating. Ammonia injection rates vary with e stack outlet NOx analyzer. During the operation of the nice the amount of slip are the operating load of the unit er of turbines in operation and the electrical generation rate of the ammonia release from the turbine stack is considered as the ammonia release estimates.

Continuous Release Reporting Form

CR-ERNS Number:	1038884
ous and Stable in Quantity ince or mixture from your j	
:	
routine, anticipated normal operations of	l, intermittent & incidental to or treatment processes.
otures, equipment failures, of CERCLA section 103(f)(2)., are not continuous or anticable in quantity and rate	Unanticipated events are
ing that the release is continuous why the release from the malfund ote above.	
ntrol emissions of NOx. This proherent to the process, some of the mmonia is called ammonia slip. tart up when catalyst temperate the turbine is operating. Amm the stack outlet NOx analyzer. Duence the amount of slip are the ber of turbines in operation and ity.	he injected ammonia remains ures reach the required ionia injection rates vary with During the operation of the coperating load of the unit I the electrical generation rate
ease and calculated release estima	ates.
☐ Engineering estimate ☒ E	Best Professional judgment
the release and release estimate ed from turbine NOx emission ar s chromatographs. As of Decem MS DAHS unit.	nalyzers, ammonia
	routine, anticipated normal operations of normal operations of tures, equipment failures, CERCLA section 103(f)(2). are not continuous or antiable in quantity and rate. Ing that the release is continuous why the release from the malfund ofte above. Introl emissions of NOx. This property is called ammonia slip. It is the turbine is operating. Ammonia is called ammonia slip. It is the turbine is operating. Ammonia ethe stack outlet NOx analyzer. It is the stack outlet NOx analyzer. It is the release amount of slip are the ober of turbines in operation and ity. In the release and release from the stack outlet NOx emission and ity. The release and release estimate and from turbine NOx emission and ity. The release and release estimate and from turbine NOx emission and ity. The release and release estimate and from turbine NOx emission and ity is chromatographs. As of December 1 is of the release estimate and from turbine NOx emission and ity is chromatographs. As of December 1 is of the release estimate as chromatographs. As of December 1 is of the release estimate as chromatographs. As of December 1 is of the release estimate is chromatographs. As of December 1 is of the release estimate is chromatographs. As of December 1 is of the release estimate is chromatographs. As of December 1 is of the release estimate is chromatographs. As of December 1 is of the release estimate is chromatographs. As of December 1 is of the release estimate is chromatographs.

SECTION II: SOURCE INFORMATION		CR-ERNS Number:	1038884
Part A: Basis for Asserting the Release is For EACH source of a release of a hazardo the following information on a SEPARATE	us substanc		
Name of Source: Turbine 214JB			
1. Indicate whether the release from this sour	rce is either:		
Continuous without interruption	OR	routine, anticipated, normal operations of	nintermittent & incidental to or treatment processes.
Note that unanticipated events, such as spills accidents, do not qualify for reduced reportion not incidental to normal operations and, by a sufficiently predictable or regular to be cons	ng under Cl definition, a	ERCLA section 103(f)(2). re not continuous or antic	Unanticipated events are
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This turbine utilizes selective catalytic reduction ammonia as the reagent for the NOx reduction reunreacted and leaves the exhaust stack as ammonia each turbine the SCR is put into service promoperational temperatures. The SCR remains in seturbine load and are automatically adjusted in returbine with SCR, ammonia slip will occur. Facto and the magnitude and number of load changes of each is directly related to the power demands. Based on the operations of the SCR during turbin routine, anticipated, and intermittent.	eaction. Inher onia. This amountly after star ervice while the esponse to the ors that influer s. The numbe s of the facility	rent to the process, some of the monia is called ammonia slip. It up when catalyst temperature turbine is operating. Ammore stack outlet NOx analyzer. Dure the amount of slip are the rof turbines in operation and .	re injected ammonia remains ares reach the required conia injection rates vary with suring the operation of the operating load of the unit the electrical generation rate
3. Identify below how you established the pa		_	
Release data Knowledge of Operating Pro		Engineering estimate 🗵 B	
Other - As part of a facility self assessment, the calculations from electronic data record reagent flow meters, fuel flow meters, a calculation is being performed by the face.	ds generated and fuel gas c	from turbine NOx emission an hromatographs. As of Decem	nalyzers, ammonia

SECTION II: SOURCE INFORMATION	CR-ERNS Number:	1038884
Part A: Basis for Asserting the Release is Continuous For EACH source of a release of a hazardous substathe following information on a SEPARATE sheet.		
Name of Source: Turbine 311J		
1: Indicate whether the release from this source is either		
Continuous without interruption OR	routine, anticipated, normal operations of	intermittent & incidental to or treatment processes.
Note that unanticipated events, such as spills, pipe rup accidents, do not qualify for reduced reporting under not incidental to normal operations and, by definition, sufficiently predictable or regular to be considered stopping.	CERCLA section 103(f)(2). are not continuous or antic	Unanticipated events are
Provide a brief statement describing the basis for stati If malfunction, describe the malfunction and expiain continuous and stable in quantity and rate given the n	why the release from the malfunc	and stable in quantity and rate. tion should be considered
This turbine utilizes selective catalytic reduction (SCR) to co ammonia as the reagent for the NOx reduction reaction. Inl unreacted and leaves the exhaust stack as ammonia. This a For each turbine the SCR is put into service promptly after soperational temperatures. The SCR remains in service while turbine load and are automatically adjusted in response to turbine with SCR, ammonia slip will occur. Factors that influend the magnitude and number of load changes. The num of each is directly related to the power demands of the facilibrated on the operations of the SCR during turbine operation routine, anticipated, and intermittent.	nerent to the process, some of the mmonia is called ammonia slip. It art up when catalyst temperature the turbine is operating. Ammothe stack outlet NOx analyzer. Duence the amount of slip are the ber of turbines in operation and ity.	re injected ammonia remains lires reach the required onia injection rates vary with luring the operation of the operating load of the unit the electrical generation rate
3. Identify below how you established the pattern or rele	ease and calculated release estima	ates.
Release data	Engineering estimate X B	Best Professional judgment
Other - As part of a facility self assessment, the pattern of calculations from electronic data records generate reagent flow meters, fuel flow meters, and fuel ga calculation is being performed by the facilities CEI	ed from turbine NOx emission ar s chromatographs. As of Decem	nalyzers, ammonia

of 20

Continuous Release Reporting Form

SECTION II: SOURCE			
INFORMATION	CR-ERNS Number:	1038884	}
(continued)			
Name of Source: Turbine 111JA			
Part B: Specific Information on the Source			
For the source identified above, provide the following	ag information. Please prov	vide a SEPARAT	E sheet for
EACH source.		1	
AFFECTED MEDIUM. Identify the environmental med by the release from this source. If your source releases hazardon			
to air and ground water), treat the release to EACH medium as format for EACH medium affected.	a separate source and complete Se	ection II, Parts A, B,	and C, of this
AIR If the medium affected is air, please also specify v	whether the source is a stack or a	ground-based area s	ource.
Stack Indicate stack height in feet or meters	42.5 ft		
O SURFACE WATER If the release affects any surface water body, give the na Surface Water Body	ame of the water body.		
If the release affects a stream, give t	he stream order or average flow r	ate, in cubic feet per	second.
Stream Order	OR Average Flow Rate (CE	ubic feet/second)	
Lake Surface area of lake (in acres)	Average depth of lak	ce (in meters)	
If the release affects a lake, give the	surface area of the lake in acres a	nd the average depth	in meters.
O SOIL OR GROUND WATER			
If the release is on or under ground, the location of publi	c water supply wells within two n	niles.	
Optional The following information is not required to comply with the regulation	Information		
The following information is not required to comply with the regulation associated with the continuous release. If this information is not provivalues. Please note that the units specified below are suggested units, identified.	ided, EPA will make conservative assur	mptions about the appro	oriate ly
For a stack release to air, provide the following information, if available	4982 KSCFH		820 F
Inside diameter (feet or meters) 7.9 ft Gas Exit Velocity (ft or meter	Gas Temp (deore	es, Fahrenheit, Kelvin,	annual avg
For a release to surface water, provide the following information, if ava-	ilable:		
Average velocity of surface water (feet/second)	_		

ECTION II: SOUR INFOR (contin	MATION	CR-ERNS Number:	1038884
Name of Source:	Turbine 111JB		
EACH source. AFFECTED MEDIUM by the release from this source	I above, provide the following Identify the environmental media If your source releases hazardouthe release to EACH medium as a	um (i.e., air, surface water, soil, o	
_	ffected is air, please also specify we e stack height in feet or meters	hether the source is a stack or a	ground-based area source.
SURFACE WATE If the release affects are Surface Water Body	ER ny surface water body, give the na	me of the water body.	
Stream	the release affects a stream, give the	OR Average Flow Rate (CL	
	urface area of lake (in acres) the release affects a lake, give the s	Average depth of lak urface area of the lake in acres a	
O SOIL OR GROU	ND WATER under ground, the location of public	water supply wells within two n	niles
associated with the continuous values. Please note that the identified.	Optional s not required to comply with the regulation pus release. If this information is not proviunits specified below are suggested units. It ovide the following information, if available Gas Exit Velocity (ft or meters	ded, EPA will make conservative assur fou may use other units; however, be cer	mptions about the appropriate tain that the units are clearly

	JRCE ORMATION tinued)	CR-ERNS Num	ber: 1038884	
Name of Source:	Turbine 111JC			
For the source identing EACH source. AFFECTED MEDIUM THE RELEGIOUS SERVICES SERVICE	fied above, provide the following JM. Identify the environmental mediatrice. If your source releases hazardour reat the release to EACH medium as an affected.	ium (i.e., air, surface water is substances to more than	r, soil, or ground water) the	at is affected epile releasing
• AIR If the media	ım affected is air, please also specify v	whether the source is a stac	k or a ground-based area	source.
⊠ Stack Ind	licate stack height in feet or meters	42.5	ft	
Surface Water Body Stream	If the release affects a stream, give to Stream Order		flow rate, in cubic feet pe	er second.
Lake	Surface area of lake (in acres) If the release affects a lake, give the		h of lake (in meters)	th in meters.
~	OUND WATER or under ground, the location of publi	c water supply wells within	n two miles	
associated with the convalues. Please note that identified.	tion is not required to comply with the regulation tinuous release. If this information is not provint the units specified below are suggested units.	ided, EPA will make conservat You may use other units; howeve	ive assumptions about the app	ropriate
For a stack release to a Inside diameter (feet or mete	r, provide the following information, if available rss) 7.9 ft Gas Exit Velocity (ft or meter	Gas Tem	p (degrees, Fahrenheit, Kelvin,	843 F annual avg
	water, provide the following information, if availge velocity of surface water (feet/second)	ilable:		

ECTION II: SOURCE INFORMATION (continued)	CR-ERNS Number:	1038884
ame of Source: Turbine 214JA		
or the source identified above, provide the following ACH source. FFECTED MEDIUM. Identify the environmental medical the release from this source. If your source releases hazardou air and ground water), treat the release to EACH medium as a must for EACH medium affected.	um (i e., air, surface water, soil, o	or ground water) that is affected edium (e.g., a wastepile releasi
AIR If the medium affected is air, please also specify w	hether the source is a stack or a	ground-based area source.
Stack Indicate stack height in feet or meters	65.0 ft	
Water Body If the release affects a stream, give the Stream		
Stream Order Lake Surface area of lake (in acres) If the release affects a lake, give the s	OR Average Flow Rate (cu	ke (in meters)
SOIL OR GROUND WATER If the release is on or under ground, the location of public		
The following information is not required to comply with the regulation associated with the continuous release. If this information is not provivalues. Please note that the units specified below are suggested units.	ided, EPA will make conservative assu	mptions about the appropriate
identified. For a stack release to air, provide the following information, if available Inside diameter (feet or meters) 12.0 ft Gas Exit Velocity (ft or meter)	s/sec) annual avg Gas Temp (degre Celsius)	750 F ees, Fahrenheit, Kelvin, annual av
For a release to surface water, provide the following information, if ava Average velocity of surface water (feet/second)	HADIC.	

Continuous Release Reporting Form

SECTION II: SOURCE INFORMATION (continued)	CR-ERNS Number:	1038884
Name of Source: Turbine 214JB		
Part B: Specific Information on the Source For the source identified above, provide the following EACH source. AFFECTED MEDIUM. Identify the environmental medical by the release from this source. If your source releases hazardout to air and ground water), treat the release to EACH medium as a format for EACH medium affected.	um (i.e., air, surface water, soil, is substances to more than one m	or ground water) that is affected nedium (e.g., a wastepile releasing
AIR If the medium affected is air, please also specify w Stack Indicate stack height in feet or meters	whether the source is a stack or a	ground-based area source.
SURFACE WATER If the release affects any surface water body, give the na Surface Water Body	me of the water body.	
Stream Stream Order	oe stream order or average flow to OR Average Flow Rate (c	
Lake Surface area of lake (in acres) If the release affects a lake, give the	Average depth of la surface area of the lake in acres a	
O SOIL OR GROUND WATER If the release is on or under ground, the location of public	c water supply wells within two	miles
Optional The following information is not required to comply with the regulation associated with the continuous release. If this information is not provide use. Please note that the units specified below are suggested units, identified For a stack release to air, provide the following information, if available linside diameter (feet or meters) 12.0 ft Gas Exit Velocity (ft or meter)	ided, EPA will make conservative assuryou may use other units; however, be ce	imptions about the appropriate
For a release to surface water, provide the following information, if ava Average velocity of surface water (feet/second)	ilable:	

Form Approved OMB No. 2050-0086 Expiration Date: 12-31-2011

SECTION II: SOURCE INFORMATIO (continued)	PΝ	CR-ERNS N	umber:	1038884	Market Market
Name of Source: Turbine 3	11J				-
Part B: Specific Information on For the source identified above, p EACH source. AFFECTED MEDIUM. Identify the to air and ground water), treat the release format for EACH medium affected.	rovide the following the environmental medical releases hazardou	um (i.e., air, surface was substances to more)	vater, soil, o than one me	or ground water) that edium (e.g., a wastep	is affected
AIR If the medium affected is a	r, please also specify what in feet or meters	Г	stack or a g	ground-based area s	ource.
SURFACE WATER If the release affects any surface v Surface Water Body	vater body, give the na	me of the water body.			
Stream If the release a	affects a stream, give th		_	ate, in cubic feet per	second.
	of lake (in acres)		_	te (in meters)	in meters
SOIL OR GROUND WAT		c water supply wells w	vithin two π	niles.	
The following information is not required associated with the continuous release. If values. Please note that the units specified identified. For a stack release to air, provide the follo	to comply with the regulation this information is not provided the below are suggested units.	ided, EPA will make consi You may use other units; ho	ervative assur	nptions about the appro	riy
	Gas Exit Velocity (ft or meter	annual avg Gas Cel	Temp (degreesius)	es, Fahrenheit, Kelvin,	annual avg
Average velocity of surfa					

Continuous Release Reporting Form

SECTION II: SOU (con	RCE INF	ORMATI	ON			CR-ERNS Number:	1038884
Part C: Identity and Pleuse provide a SEP	•			ostance or Mixturo	Released Fron	n Each Source	
Name of Source:	Turbin	e 111JA					
List each hazardous subs	tance releas	ed from the s	ource identified	i above and provide t	he following infor	mation. Include units where approp	oriate. Radionuclides in curies (Ci).
Name of Hazardous Sub	estance	CASRN#		mal Range g, or Ci per day) <u>Lower Bound</u>	Number of Day Release Occur (per year)		ar Period of the <u>Release</u>
Ammonia	13	3346-21-6	214.3 lbs	0 lbs	145 (for 2012) 15984 lbs	All 12 months
]							
			<u> </u>		<u> </u>		
List each mixture release	d from the s	ource identifi	ed above and p			ude units where appropriate. Radionuc	lides in curies (Ci).
	e of Hazardov Substance	ıs	Weight	Normal Range of Components (in lbs., kg, or Ci per C Upper Low	Mixta lay) (in lbs., kg, or	ıre	Total Quantity of Mixture Released in Previous Year Period of the
	omponents	CASRN #		Bound Bour		Bound (per year)	(in lbs., kg or Ci) Release

SECTION II: SOU	JRCE I		ON			CR-ER	NS Number:	1038884	
Part C: Identity and Please provide a SEP				stance or Mixture	e Released Fro	m Each So	urc <u>e</u>		
Name of Source:	Tur	bine 111JB							
list each hazardous sub	stance rel	eased from the so	ource identified	above and provide t	he following infor	mation, Inc	lude units where approp	priate. Radionuclides in	curies (Ci).
Name of Hazardous Sul	bstance	CASRN#		mal Range g, or Ci per day) Lower Bound	Number of Da Release Occur (per year)	rs Relea	Total Quantity sed in Previous Ye n lbs., kg, or Ci)	ar Period <u>Rele</u>	
Ammonia		13346-21-6	137.8 lbs	0 lbs	118 (for 2012	6608	3 lbs	All 12 month	ns
								,	
]			ļ		<u> </u>	
			<u> </u>						
ist each mixture release	ed from tl	ie source identifi	ed above and p	rovide the following	information, Inc	hide units where	appropriate. Radionuc	lides in curies (Ci).	
,	e of Hazai Substance		Weight	Normal Range of Components (in lbs., kg, or Ci per of Upper Low	Mixt (in lbs., kg, or	ture	Number of Days Release Occurs	Total Quantity of Mixture Released in Previous Year	
	Component		4	Bound Bour		Bound	(per year)	(in lbs., kg or Ci)	
			, y						

SECTION II:	SOURCE (continued		ON			CR	R-ERNS Number:	1038884
Part C: Identity Please provide a		•		stance or Mixture	e Released F	rom Ea	ch Source	
Name of Source	ı: Tu	rbine 111JC						
List each hazardou	s substance re	eleased from the s	ource identified	above and provide t	he following in	formation	1. Include units where appropr	iate. Radionuclides in curies (Ci)
Name of Hazardo	us Substance	CASRN#		nal Range 3, or Ci per day) Lower Bound	Number of Release Oc (per yea	curs	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the <u>Release</u>
Ammonia		13346-21-6	687.2 lbs	0 lbs	172 (for 20	012)	51306 lbs	All 12 months
						···		
					1			
List each mixture r	eleased from	the source identifi	ed above and p				s where appropriate. Radionuclio	des in curies (Ci).
Number	Name of Haza	e	Weight	Normal Range of Components (in lbs., kg, or Ci per of Upper Low	May) (in lbs., kg er Upper	Lo	day) Number of Days wer Release Occurs	Total Quantity of Mixture Released in Previous Year Period of
Name of Mixture	Componer	nts CASRN#	Percentage	Bound Bour	nd Bound	Bor	und (per year)	(in lbs., kg or Ci) Release

SECTION II: S	OURCE I		ON			CR-ER	NS Number: 1	1038884	
Part C: Identity : Please provide a S				stance or Mixture	e Released Fron	n Each So	urce		
Name of Source:	Tur	rbine 214JA	:		Application of the second of t				
List each hazardous	substance re	leased from the so	ource identified	above and provide the	he following infori	nation. Inc	blude units where appropri	ate. Radionuclides in co	uries (Ci).
Name of Hazardous	Substance	CASRN#		mal Range g, or Ci per day) Lower Bound	Number of Day Release Occurs (per year)	s Relea	Total Quantity used in Previous Year in Ibs., kg., or Ci)	Period c <u>Relea</u>	
Ammonia		13346-21-6	22.6	0 lbs	274 (for 2012)) 964.	9 lbs	All 12 month	IS
	MANUFACTURE TO SERVICE								
			1		1				
								} .	
ist each mixture rel	eased from t	he source identifi	ed above and pi	rovide the following i	information. Inch	ade units where	appropriate. Radionuclid	les in curies (Ci).	
١	Name of Haza Substance		Weight	Normal Range of Components (in Ibs., kg, or Ci per d Upper Lowe	Mixtuday) (in lbs., kg, or	ure		Total Quantity of Mixture Released in Previous Year	Period of th
Name of Mixture	Componen			Bound Boun		Bound		(in lbs., kg or Ci)	Release
	Million States - 197 Payage report and audioidal P		AND THE REAL PROPERTY OF THE PARTY OF THE PA			***************************************			
,				,					

SECTION II:	ECTION II: SOURCE INFORMATION (continued)							1038884	
Part C: Identit Please provide a	·			stance or Mixtur	e Released Fro	om Each So	<u>ource</u>		
Name of Source	e: Tui	bine 214JB							
List each hazardou	ıs substance re	leased from the so	ource identified	above and provide t	he following info	rmation. ln	clude units where approp	riate. Radionuclides in curies (Cí).
Name of Hazardo	ous Substance	CASRN#		nal Range g, or Ci per day) Lower Bound	Number of Da Release Occi (per year)	ırs Rele	Total Quantity ased in Previous Yea (in lbs., kg, or Ci)	r Period of the <u>Release</u>	
Ammonia		13346-21-6	41.4 lbs	0 lbs	113 (for 201	2) 315	.9 lbs	All 12 months	
								and the second s	
							,		
List each mixture i	released from t	he source identifi	ed above and p	rovide the following	information. In	clude units when	e appropriate. Radionucl	ides in curies (Ci).	
	Name of Haza			Normal Range of Components (in lbs., kg, or Ci per o	Mix day) (in lbs., kg, d			Total Quantity of Mixture Released	
Name of Mixture	Substance Componer		Weight Percentage	Upper Low Bound Boun		Lower Bound	Release Occurs (per year)	in Previous Year Peri	iod of th Lelease
					1				
			-	, ,		1			

SECTION II: SO	URCE I		ON			CR-ERNS Number:	1038884
Part C: Identity an Please provide a SE.	d Quanti PARATE :	ty of Each Ha sheet for EACH	zardous Sub A source.	stance or Mixtur	e Released Fro	m Each Source	
Name of Source:	Tur	bine 311J					
List each hazardous su	bstance rel	eased from the s	ource identified	l above and provide t	he following infor	rmation. Include units where appr	ropriate. Radionuclides in curies (Ci)
Name of Hazardous S	ubstanc <u>e</u>	CASRN#		mal Range g, or Ci per day) <u>Lower Bound</u>	Number of Da Release Occu <u>(per year</u>)		ear Period of the <u>Release</u>
Ammonia		13346-21-6	59.1 lbs	0 lbs	97 (for 2012)	2803 lbs	All 12 months
						-	- Andrew - A
		}					
		<u> </u>					
	ne of Hazai	·dous	Weight	Normal Range of Components (in lbs., kg, or Ci per Upper Low	OR Normal F Mixiday) (in lbs., kg, o	ture .	Total Quantity of s Mixture Released
Name of Mixture	Component		-	Bound Bou		Bound (per year)	(in lbs., kg or Ci) Release

SECTION III: SUBSTANCE INFORMATION		CR-ERNS Number:	1038884
Calculation of the SSI Trigger For EACH hazardous substance comp the releasing sources and their upper l substance.	oonent of a mix bounds. Please	ture indicated in Section II use a SEPARATE sheet f	I, Part C, list the names of or EACH hazardous
Name of Hazardous Substance:	Ammonia		
To calculate the SSI trigger (i.e., the upper boabove, aggregate the upper bounds of the nor Section II, Part C. If the hazardous substance component as calculated in Section II, Part C.	mal range of the ide	dentified hazardous substance act ent of a mixture, be certain to inc	ross all sources identified in
Name of Source(s)		Upper Bound of the Nor the Release (specify Ibs	
Turbine 111JA	214.	3 lbs	
Turbine 111JB	137.	8 lbs	
Turbine 111JC	687.	2 lbs	
Turbine 214JA	22.6	lbs	
Turbine 214 JB	41.4	lbs	
Turbine 311J	59.1	lbs	
TOTAL - SSI trigger for this haz	ardous substa	nce release*: 1099 lbs	

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

Paul E Dickson (Services - 6)

From:

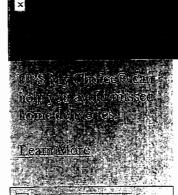
UPS Quantum View [auto-notify@ups.com]

Sent: To:

Tuesday, March 19, 2013 10:52 AM Paul E Dickson (Services - 6)

Subject:

UPS Delivery Notification, Tracking Number 1Z06W3A20197724771



***Do not reply to this e-mail. UPS and Dominion Cove Point will not receive your reply.

At the request of Dominion Cove Point, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1Z06W3A20197724771

Delivery Date / Time: 19-March-2013 / 10:22 AM

Delivery Location: INSIDE DELIVERY

Signed by: KUSTRA

Shipment Detail

Ship To:

CR-ERNS Coordinator

USEPA, Region 3(3HW-30)

1650 ARCH ST

ROOM 300

PHILADELPHIA

PA

19103

US

Number of Packages: 1

UPS Service:

NEXT DAY AIR

Shipment Type:

Letter

Reference Number 2: CPOP.OTHER.01

Reference Number 3: CR-ERNS 1038884 Initial continuous

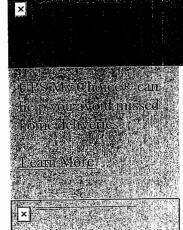
Paul E Dickson (Services - 6)

From: Sent: To: UPS Quantum View [auto-notify@ups.com] Tuesday, March 19, 2013 10:52 AM

Paul E Dickson (Services - 6)

Subject:

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NEXT DAY AIR

Shipment Type:

Letter

Reference Number 2: CPOP.OTHER.01

Reference Number 3: CR-ERNS 1038884 Initial continuous

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Contact UPS

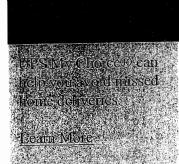
Paul E Dickson (Services - 6)

From: Sent: UPS Quantum View [auto-notify@ups.com] Tuesday, March 19, 2013 10:43 AM

Paul E Dickson (Services - 6)

To: Subject:

UPS Delivery Notification, Tracking Number 1Z06W3A20198837399



***Do not reply to this e-mail. UPS and Dominion Cove Point will not receive your reply.

At the request of Dominion Cove Point, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: <u>1Z06W3A20198837399</u> **Delivery Date / Time:** 19-March-2013 / 10:10 AM

Delivery Location: OFFICE

Signed by: SABASA

Shipment Detail

Ship To:

Patricia Williams

MDE-SSA-Community Reight to Know

1800 WASHINGTON BLVD

ROOM E

BALTIMORE

MD

21230

US

Number of Packages: 1

UPS Service:

NEXT DAY AIR

Shipment Type:

Letter

Reference Number 2: CPOP.OTHER.01

Reference Number 3: CR-ERNS 103884 Initial Continuous

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Paul E Dickson (Services - 6)

From: Sent: To: UPS Quantum View [auto-notify@ups.com]

Tuesday, March 19, 2013 12:13 PM Paul E Dickson (Services - 6)

Subject:

UPS Delivery Notification, Tracking Number 1Z06W3A20197928186

EES My Choice Can help you avoid messed from each years.

Learn More

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At the request of Dominion Cove Point, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number:

1Z06W3A20197928186

Delivery Date / Time: 19-March-2013 / 11:41 AM

Delivery Location: RECEIVER

Signed by: HQLLY

Shipment Detail

Ship To:

Mr. Robert Fenwick, Director

Calvert County Emergency Mgmt.

175 MAIN ST

PRINCE FREDERICK

MD

20678

US

Number of Packages: 1

UPS Service:

NEXT DAY AIR

Shipment Type:

Letter

Reference Number 2: CPOP.OTHER.01

Reference Number 3: CR-ERNS 1038884 Initial Continuous

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Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 24

May 20, 2005 EPCRA Section 311 Submission



BY U.S. MAIL, RETURN RECEIPT REQUESTED

Calvert County Emergency Management 175 Main Street Prince Frederick, MD 20678

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for any hazardous chemical product stored or used here at Cove Point above a certain threshold. Earlier this month, we received a shipment of ammonium hydroxide solution, also known as aqua ammonia. This is the first time we have received this chemical product. An MSDS sheet for ammonium hydroxide solution is enclosed.

If you have any questions or need additional information, please call me at (410) 286-5136.

Sincerely,

James E. Levin

Environmental Engineer

Enclosure

Cc: M. Gardner
R. Jackson

1



BY U.S. MAIL, RETURN RECEIPT REQUESTED

MDE-TARSA Community Right-to-Know Section 1800 Washington Boulevard, Suite 540 Baltimore, MD 21230-1718

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for any hazardous chemical product stored or used here at Cove Point above a certain threshold. Earlier this month, we received a shipment of ammonium hydroxide solution, also known as aqua ammonia. This is the first time we have received this chemical product. An MSDS sheet for ammonium hydroxide solution is enclosed.

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Sincerely,

James E. Levin

Environmental Engineer

Enclosure

Cc: M. Gardner R. Jackson



BY U.S. MAIL, RETURN RECEIPT REQUESTED

Solomons VFD & Rescue P.O. Box 189 Solomons, MD 20688

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for any hazardous chemical product stored or used here at Cove Point above a certain threshold. Earlier this month, we received a shipment of ammonium hydroxide solution, also known as aqua ammonia. This is the first time we have received this chemical product. An MSDS sheet for ammonium hydroxide solution is enclosed.

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Sincerely,

James E. Levin

Environmental Engineer

ans E Levi

Enclosure

Cc: M. Gardner R. Jackson

PPE for protection against 0-19.9% Aqua Ammonia Loudoun Compressor Station, Leesburg, VA (and CP LNG)

LAROCHE INDUSTRIES INC.

Material Safety Data Sheet #4003 10/01/98

Last Revision

SECTION 1: CHEMICAL PRODUCT & COMPANY IDENTIFICATION

CHEMICAL NAME: Ammonium Hydroxide

TRADE NAMES/SYNONYMS: Aqua Ammonia, Ammonium

Hydroxide

PRODUCT CODE: 5807

LaRoche Industries Inc.

MANUFACTURER AND/OR DISTRIBUTOR:

EMERGENCY TELEPHONE NUMBERS:

Transportation (CHEMTREC): 1-800-424-

9300

1100 Johnson Ferry Rd., NE

Environmental/Health/Safety:

1-800-528-

4963

Atlanta, GA 30342 USA

Customer Service (Toll Free):

1-877-474-

IDLI

300t

4643

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

% BY WEIGHT OSHA PEL NIOSH REL / ACGIHTLY CHEMICAL **FORMULA** CAS 5 - 19.9 7664-41-7 50 ppm(TWA) 25 ppm(TWA) 35 ppm(STEL) NH₃ Ammonia NH₄OH 100 1336-21-6 Agua Ammonia

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW: 1. Colorless liquid with pungent odor 2. Avoid contact with liquid and vapor 3. Not flammable

4. Mixes with water 5. Harmful to aquatic life in very low concentrations 6. Stop discharge if possible POTENTIAL HEALTH EFFECT - ROUTES OF ENTRY: Inhalation, Skin Contact, Eye Contact, Ingestion

TARGET ORGANS: Eyes, skin and respiratory system

EYE CONTACT: May be severely irritating upon liquid exposure, with mild irritation from fumes.

SKIN CONTACT: High concentrations can cause severe irritation and burns.

INHALATION: The gas can be suffocating and is irritating to the mucous membranes and lung tissue.

INGESTION: Can cause vomiting, nausea and corrosive burns to the esophagus and stomach. The exact nature and intensity of toxic effects following ingestion of varying amounts of strong aqua ammonia solution (e.g. 28%) is unpredictable. The most accepted view is that any amount from one teaspoon or greater can be dangerous if ingested.

SECTION 4: FIRST AID MEASURES

EYE CONTACT: Flush with large amounts of water for at least 15 minutes then immediately seek medical aid. SKIN CONTACT: Immediately flush with large quantities of water for at least 15 minutes while removing clothing. Seek immediate medical aid.

INHALATION: Remove from exposure. If breathing has stopped or is difficult, administer artificial respiration or oxygen as needed. Seek immediate medical aid.

INGESTION: Do not induce vomiting. Have the victim drink large quantities of water if conscious. Immediately seek medical aid.

Never give anything by mouth to an unconscious person.

SECTION 5: FIRE FIGHTING MEASURES

FLASH POINT: Not Applicable

FLAMMABLE LIMITS: 16-25% in air (NH₃)

EXTINGUISHING MEDIA: Water fog or spray for escaping ammonia gas.

SPECIAL FIRE FIGHTING PROCEDURES: The mixture will not burn but escaping gas can burn in the range of 16-25% in air.

Wear full protective clothing and self-contained breathing apparatus in the pressure demand mode.

NFPA HAZARD CLASSIFICATION (Aqua): Not rated by NFPA

NFPA HAZARD CLASSIFICATION (Ammonia): Health: 3 Flammability: 1 Reactivity: 0 (least-0—4-highest)

SECTION 6: ACCIDENTAL RELEASE MEASURES

Releases of 1,000 lb. or more of ammonium hydroxide (aqua ammonia) within 24 hours must be immediately (within minutes)

reported to the National Response Center at 1-800-424-8802, as well as appropriate local and state agencies.

SUGGESTED LOCAL ACTION: Releases will liberate irritating vapors. Spilled liquids should be contained and not washed into

PPE for protection against 0-19.9% Aqua Ammonia Loudoun Compressor Station, Leesburg, VA (and CP LNG)

sewers or ground water. Prevent large quantities from contact with vegetation or waterways. Ammonium hydroxide (aqua ammonia) is a regulated material and reporting of any release may be required. Any release of this material, during the course of loading, transporting, unloading or temporary storage, must be reported to the US DOT as required by 49 CFR 171.15 and 171.16.

SECTION 7: HANDLING AND STORAGE

Store in ventilated containers or pressure vessels away from heat. Open containers cautiously in case of pressure build up.

Zinc, copper and copper alloys such as brass are rapidly corroded by ammonium hydroxide (aqua ammonia).

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

RESPIRATORY PROTECTION: Respiratory protection approved by NIOSH/MSHA for ammonia must be used when exposure

limits are exceeded. Whether a chemical cartridge respirator or a self-contained breathing apparatus is sufficient for effective

respiratory protection depends on the type and magnitude of exposure.

SKIN PROTECTION: Rubber gloves and rubber or other types of approved protective clothing should be used to prevent skin

contact. A face shield should be used for increased protection from contact with liquid.

EYE PROTECTION: Chemical splash goggles, approved for use with ammonia, must be worn to prevent eye contact with liquid

or vapor. A face shield should be used for increased protection from contact with liquid.

VENTILATION: Local positive pressure and/or exhaust ventilation should be used to reduce vapor concentrations in confined

spaces. Ammonia vapor, being lighter than air, can be expected to dissipate in the upper atmosphere. Ammonia concentrations

may also be reduced by the use of an appropriate absorbent or reactant material.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT: Approx. 160°F (10% Soln.)

SPECIFIC GRAVITY:

\$ @ 68°F

(10%

Soin.)(Water=1)

MELTING POINT: Approx. 15°F(10% Soln.)

SOLUBILITY IN WATER: Complete

pH: Approx. 11.6 for 1 N NH₃ Soln.

VAPOR DENSITY: 0.60 @ 32°F(Air=1)
PERCENT VOLATILE BY VOLUME: 100%

APPEARANCE: Colorless (pungent) liquid

VAPOR PRESSURE(mmHg): 130 @ 80°F(10% Soln.)

SECTION 10: STABILITY AND REACTIVITY

STABILITY: Material generally considered stable. However, heating above ambient temperatures causes the vapor pressure of

ammonia to increase rapidly.

INCOMPATIBILITY(Materials to Avoid): Strong acids. Aqua Ammonia reacts with bromine, chlorine, mercury, silver, silver solder, and hypochlorite (bleach) to form explosive compounds. Avoid use of metals containing copper or zinc.

HAZARDOUS DECOMPOSITION PRODUCTS: Heating and contact of vapors with very hot surfaces may form

HAZARDOUS DECOMPOSITION PRODUCTS: Heating and contact of vapors with very hot surfaces may form hydrogen.

The decomposition temperature may be lowered to 575°F by contact with certain metals such as nickel.

HAZARDOUS POLYMERIZATION: Will not occur

CONDITIONS TO AVOID: Not applicable

SECTION 11: TOXICOLOGICAL INFORMATION

TOXICITY BY INGESTION: Grade 3; Oral Rat, LD₅₀ = 350 mg/kg

Ammonia is a strong alkali and readily damages all body tissues. Ammonia is not a cumulative metabolic poison.

SECTION 12: ECOLOGICAL INFORMATION

AQUATIC TOXICITY: 6.25ppm 24hr/Trout/Lethal/Freshwater; 15ppm 48hr/Sunfish/TLm/Tap Water

WATERFOWL TOXICITY: Data not available

BIOCHEMICAL OXYGEN DEMAND: Data not available FOOD CHAIN CONCENTRATION POTENTAIL: None

SECTION 13: DISPOSAL CONSIDERATIONS

Consult local, state or federal regulatory agencies for acceptable disposal procedures and disposal locations. Disposal in streams or sewers may be contrary to federal, state, and local regulations. For Hazardous Waste Regulations call 1-800-424-9346, the RCRA Hotline.

SECTION 14: TRANSPORT INFORMATION

PPE for protection against 0-19.9% Aqua Ammonia Loudoun Compressor Station, Leesburg, VA (and CP LNG)

For 5 to 10% Ammonia Solutions

For >10 to 19.9% Ammonia Solutions

Proper shipping name:

Corrosive Liquid, N.O.S. (contains ammonia)

Ammonium Hydroxide

65:

DOT Hazard Class:

8

8

Identification Number:

UN1760

UN2672

Packing Group:

111

III

SECTION 15: REGULATORY INFORMATION

NOTICE: This product is subject to the reporting requirements of SARA (1986, Section 313 of Title III) and 40 CFR Part 370.

OSHA HAZARD COMMUNICATION RULE, 20 CFR 1910.1200: Aqua ammonia is a hazardous chemical.

TOXIC SUBSTANCE CONTROL ACT: Ammonium Hydroxide (CAS# 1336-21-6) is listed in the TSCA Inventory.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (SARA, TITLE III): Section 302 Extremely Hazardous

Substance: <u>Yes</u> (as Ammonia); Section 311/312 Hazardous Categories: <u>Immediate (Acute) Health Hazard;</u> Section 313 Toxic Chemical: <u>Yes (Ammonia)</u>.

CERCLA/SUPERFUND, 40 CFR 117 & 302: This product is 100% Ammonium Hydroxide which if released into the environment

in quantities of 1,000 lb. or more requires notification to the National Response Center in Washington, DC at 1-800-424-8802.

WHMIS: One percent (1%), as ammonia

CALIFORNIA PROPOSITION

Reproductive:

No

Carcinogen: No

OSHA PROCESS SAFETY MANAGEMENT, 29 CFR 1910.119: This product is <u>not</u> subject to the Process Safety Management

requirements of 29 CFR 1910.119.

EPA CHEMICAL ACCIDENTAL RELEASE PREVENTION, 40 CFR PART 68: This product is <u>not</u> subject to the Risk Management Plan requirements of 40 CFR Part 68.

DRINKING WATER: Maximum use dosage in potable water is 10 mg/l.

SECTION 16: OTHER INFORMATION

REASON FOR REVISION: 1. Addition of new Toll Free Customer Service Number in Section 1; 2. Revision to concentration

range in Section 2; 3. Addition to DOT Proper Shipping Information in Section 14; 4. Revision to EPCRA Section 302 information

in Section 15; and 5. Supersedes MSDS dated 4/15/98

MSDS PREPARED BY: LaRoche industries Inc.'s Corporate Office of Regulatory Affairs.

This information is taken from sources or based upon data believed to be reliable, however, LaRoche Industries Inc. makes no warranty as to the absolute correctness or sufficiency of any of the foregoing or that additional or other measures may not be required under particular conditions.

SENDER: CCMPLITE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete item 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that secan return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: SOLOMON VFD FOBOX 189 SOLOMONS, MD 20688 	A. Received by (Please Print Clearly) B. Date of Delivery C. Signature X Leigh Ann Langler Addressee D. Is delivery address different from item 12 Yes If YES, enter delivery address below:
2. Article Number (Copy from paging t	3. Service Type Certified Mail
2. Article Number (Copy from Service # 7003	3110 0002 6106 2130 t in Use
PS Form 3811, July 1999 Domestic Ret	turn Receipt 102595-00-M-0952

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for any hazardous chemical product stored or used here at Cove Point above a certain threshold. Earlier this month, we received a shipment of ammonium hydroxide solution, also known as aqua ammonia. This is the first time we have received this chemical product. An MSDS sheet for ammonium hydroxide solution is enclosed.

If you have any questions or need additional information, please call me at (410) 286-5136.

Sincerely,

James E. Levin Environmental Engineer

NDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to:	A. Received by (Please Print Clearing). Date of Delivery C. Signature X Agent Addressee D. Is delivery address different from item 1?
100 wash Bird Stester Wash and, md 21230	3. Service Type Certified Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.
\	4. Restricted Delivery? (Extra Fee)
arm 3811 July 1999 Domestic Rel	

BY U.S. MAIL, RETURN RECEIPT REQUESTED

Calvert County Emergency Management 175 Main Street Prince Frederick, MD 20678

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for any hazardous chemical product stored or used here at Cove Point above a certain threshold. Earlier this month, we received a shipment of ammonium hydroxide solution, also known as aqua ammonia. This is the first time we have received this chemical product. An MSDS sheet for ammonium hydroxide solution is enclosed.

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Sincerely,

James E. Levin Environmental Engineer

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELI	VERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Cauco Engy - mant 175 main Street 	Received by (Please Print Clearly) C. Signature X	
Article Number (Copy from service label)	3. Service Type Certified Mail Express Ma Registered Return Rece Insured Mail C.O.D. 4. Restricted Delivery? (Extra Fee)	il eipt for Merchandise
S Form 3811, July 1999 Domestic Ret	urn Receipt	102595-00-M-0952

Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 25

December 15, 2006 EPCRA Section 311 Submission



December 15, 2006

BY U.S. MAIL, RETURN RECEIPT REQUESTED

7005 1820 0001 1177 4750

MDE-TARSA Community Right-to-Know Section 1800 Washington Boulevard, Suite 540 Baltimore, MD 21230-1718

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for designated hazardous chemical products stored or used here at Cove Point. Earlier this month, we received **isobutane** (CAS 75-28-5) for use in one of our LNG regasification processes.

This is the first time we have received this chemical product since facility reactivation. A 16-part MSDS sheet for isobutane is enclosed.

If you have any questions or need additional information, please call me at (410) 286-5136.

Yours truly,

James E. Levin

Environmental Engineer

Enclosure



SENDER: COMPLETE THIS SECT	ION	COMPLETE THIS SECTION ON DELIVE	RY
■ Complete items 1, 2, and 3. Also item 4 if Restricted Delivery is des Print your name and address on the solution of the card to the Attach this card to the back of the or on the front if space permits. 1. Article Addressed to: MDE -TA RSA Community Right-to 1800 Washington Blue Paul 1999 A 2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	ired. he reverse you. he mailpiece,	D. Is delivery address different from item 1 If YES, enter delivery address below:	☐ Agent ☐ Addressee Date of Delivery Yes ☐ No
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Article Number (Transfer from service label)	7005	1820 0001 1177 4750	The state of the s
PS Form 3811, February 2004	Domestic Re	turn Receipt	102595-02-M-1540



December 15, 2006

BY U.S. MAIL, RETURN RECEIPT REQUESTED

7005 1820 0001 1177 4743

Calvert County Emergency Management 175 Main Street Prince Frederick, MD 20678

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for designated chemical products stored or used here at Cove Point. Earlier this month, we received **isobutane** (CAS 75-28-5) for use in one of our LNG regasification processes.

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Yours truly,

James E. Levin

Environmental Engineer

Enclosure

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or PO Box No.

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Sent To
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or PO Box No.

City, State, ZIP+4 Prince Frederick, MD 20678

PS Form 3800, June 2002

See Reverse for Instructions

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 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Calvert County Emergency Management Main Street 	A. Signature Agent Addressee Addressee B. Received by (Prilated Name) C. Date of Delivery C. Date of Delive
Prince Frederick, MD 20678	3. Service Type Certified Mail □ Express Mail □ Registered □ Return Receipt for Merchandise □ Insured Mail □ C.O.D. 4. Restricted Delivery? (Extra Fee) □ Yes
Article Number 7005 (Transfer from service label)	1820 0001 1177 4743
PS Form 3811, February 2004 Domestic F	Return Receipt 102595-02-M-1540



December 15, 2006

BY U.S. MAIL, RETURN RECEIPT REQUESTED

7005 1820 0001 1177 4736

Solomons VFD and Rescue 13150 HG Trueman Solomons, Maryland 20688

RE: Cove Point LNG Terminal; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for designated chemical products stored or used here at Cove Point. Earlier this month, we received **isobutane** (CAS 75-28-5) for use in one of our LNG regasification processes.

This is the first time we have received this chemical product since facility reactivation. A 16-part MSDS sheet for isobutane is enclosed.

If you have any questions or need additional information, please call me at (410) 286-5136.

Yours truly,

James E. Levin

Environmental Engineer

E Levin

Enclosure

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Sent To Solomons VFD and Rescue
Street, Apt. No.; or PO Box No. 13/50 HG Trueman
City, State, ZIP-4 Solomons, MD 20688

PS Form 3800, June 2002

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON BELIVE IT
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature X
1. Article Addressed to:	If YES, enter delivery address below:
Solomons VFD and Rescue	
13150 HG Trueman	
Solomons, Maryland 20688	3. Service Type
	☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.
	4. Restricted Delivery? (Extra Fee)
2. Article Number 7005	1820 0001 1177 4736
PS Form 3811, February 2004 Domestic Ret	um Receipt 102595-02-M-1540



MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ISOBUTANE

1. Chemical Product and Company Identification

BOC Gases, Division of

The BOC Group, Inc. 575 Mountain Avenue

Murray Hill, NJ 07974

TELEPHONE NUMBER: (908) 464-8100

24-HOUR EMERGENCY TELEPHONE NUMBER:

CHEMTREC (800) 424-9300

BOC Gases

Division of

BOC Canada Limited

5975 Falbourne Street, Unit 2 Mississauga, Ontario L5R 3W6

TELEPHONE NUMBER: (905) 501-1700

24-HOUR EMERGENCY TELEPHONE NUMBER:

(905) 501-0802

EMERGENCY RESPONSE PLAN NO: 20101

PRODUCT NAME: ISOBUTANE CHEMICAL NAME: Isobutane

COMMON NAMES/SYNONYMS: 2-Methylpropane, Trimethylmethane

TDG (Canada) CLASSIFICATION: 2.1 WHMIS CLASSIFICATION: A, B1, D2B

PREPARED BY: Loss Control (908)464-8100/(905)501-1700

PREPARATION DATE: 6/1/95 REVIEW DATES: 6/7/96

2. Composition, Information on Ingredients

INGREDIENT	% VOLUME	PEL-OSHA ¹	TLV-ACGIH ²	LD ₅₀ or LC ₅₀ Route/Species
Isobutane FORMULA: C ₄ H ₁₀ CAS: 75-28-5 RTECS #: Not in RTECS	99.0 to 99.9	Simple Asphyxiant	Simple Asphyxiant	Not Available

As stated in 29 CFR 1910, Subpart Z (revised July 1, 1993)

3. Hazards Identification

EMERGENCY OVERVIEW

This product does not contain oxygen and may cause asphyxia if released in a confined area. Simple hydrocarbons can cause irritation and central nervous system depression at high concentrations. Extremely flammable.

ROUTE OF ENTRY:

Skin Contact	Skin Absorption	Eye Contact	Inhalation	Ingestion
Yes	No	Yes	Yes	No ·

MSDS: G-95 Revised: 6/7/96

² As stated in the ACGIH 1994-95 Threshold Limit Values for Chemical Substances and Physical Agents

PRODUCT NAME: ISOBUTANE

HEALTH EFFECTS:

Exposure Limits	Irritant	Sensitization
No	Yes	No
Teratogen	Reproductive Hazard	Mutagen
No	No	No
Synergistic Effects		
None Reported		

Carcinogenicity: -- NTP: No IARC: No OSHA: No

EYE EFFECTS:

None anticipated as product is a gas at room temperature.

SKIN EFFECTS:

None anticipated as product is a gas at room temperature.

INGESTION EFFECTS:

Ingestion is unlikely.

INHALATION EFFECTS:

Product is relatively nontoxic. Simple hydrocarbons can irritate the eyes, mucous membranes and respiratory system at high concentrations.

Inhalation of high concentrations may cause dizziness, disorientation, incoordination, narcosis, nausea or narcotic effects.

This product may displace oxygen if released in a confined space. Maintain oxygen levels above 19.5% at sea level to prevent asphyxiation.

Effects of oxygen deficiency resulting from simple asphyxiants may include: rapid breathing, diminished mental alertness, impaired muscular coordination, faulty judgement, depression of all sensations, emotional instability, and fatigue. As asphyxiation progresses, nausea, vomiting, prostration, and loss of consciousness may result, eventually leading to convulsions, coma, and death.

Oxygen deficiency during pregnancy has produced developmental abnormalities in humans and experimental animals.

NFPA HAZARD CODES	HMIS HAZARD CODES	RATINGS SYSTEM
Health: 1 Flammability: 4 Reactivity: 0	Health: 1 Flammability: 4 Reactivity: 0	0 = No Hazard 1 = Slight Hazard 2 = Moderate Hazard
		3 = Serious Hazard

4. First Aid Measures

EYES:

Never introduce oil or ointment into the eyes without medical advice! If pain is present, refer the victim to an ophthalmologist for further treatment and follow up.

SKIN:

MSDS: G-95 Revised: 6/7/96

PRODUCT NAME: ISOBUTANE

Remove contaminated clothing and flush affected area with cold water and soap. If irritation persists, seek medical attention.

INGESTION:

Not normally required. Seek immediate medical attention.

INHALATION:

PROMPT MEDICAL ATTENTION IS MANDATORY IN ALL CASES OF OVEREXPOSURE TO PRODUCT. RESCUE PERSONNEL SHOULD BE EQUIPPED WITH SELF-CONTAINED BREATHING APPARATUS. Conscious persons should be assisted to an uncontaminated area and inhale fresh air. Quick removal from the contaminated area is most important. Unconscious persons should be moved to an uncontaminated area, given assisted (artificial) respiration and supplemental oxygen. Further treatment should be symptomatic and supportive.

5. Fire Fighting Measures

Conditions of Flammability: Flammable liquid and vapor					
Flash point:	Method:		Autoignition		
-117°F (-83°C)	Closed Cup		Temperature:	778°F (420°C)	
LEL(%): 1.8		UEL(%): 8.4			
Hazardous combustion products: Carbon monoxide, Carbon dioxide					
Sensitivity to mechanical shock: None					
Sensitivity to static discharge: Not Available					

FIRE AND EXPLOSION HAZARDS:

Isobutane is heavier than air and may travel a considerable distance to an ignition source. Isobutane is a flammable gas! Keep away from open flame and other sources of ignition. Do not allow smoking in storage areas or when handling.

EXTINGUISHING MEDIA:

Water, carbon dioxide, dry chemical.

FIRE FIGHTING INSTRUCTIONS:

If possible, stop the flow of gas with a remote valve. Use water spray to cool fire exposed containers. If fire is extinguished and flow of gas is continued, increase ventilation to prevent a build up of a flammable/explosive atmosphere. Extinguish sources of ignition.

Be cautious of a Boiling Liquid Evaporating Vapor Explosion, BLEVE, if flame is impinging on surrounding containers. Direct 500 GPM water stream onto containers above the liquid level with remote monitors. Limit the number of personnle in poximity to the fire. Evacuate surrouning areas to at least 3000 feet in all directions.

6. Accidental Release Measures

Evacuate all personnel from affected area. Use appropriate protective equipment. Increase ventilation to prevent build up of a flammable/explosive atmosphere. Extinguish all sources of ignition! If leak is in user's equipment, be certain to purge piping with inert gas prior to attempting repairs. If leak is in container or container valve, contact the appropriate emergency telephone number listed in Section 1 or call your closest BOC location

7. Handling and Storage

MSDS: G-95 Revised: 6/7/96

PRODUCT NAME: ISOBUTANE

Earth bond and ground all lines and equipment associated with the product system. Electrical equipment should be non-sparking and explosion proof.

Use only in well-ventilated areas. Valve protection caps must remain in place unless container is secured with valve outlet piped to use point. Do not drag, slide or roll cylinders. Use a suitable hand truck for cylinder movement. Use a pressure regulator when connecting cylinder to lower pressure (<250 psig) piping or systems. Do not heat cylinder by any means to increase the discharge rate of product from the cylinder. Use a check valve or trap in the discharge line to prevent hazardous back flow into the cylinder.

Protect cylinders from physical damage. Store in cool, dry, well-ventilated area away from heavily trafficked areas and emergency exits. Do not allow the temperature where cylinders are stored to exceed 130°F (54°C). Cylinders should be stored upright and firmly secured to prevent falling or being knocked over. Full and empty cylinders should be segregated. Use a "first in-first out" inventory system to prevent full cylinders from being stored for excessive periods of time.

Post "No Smoking" signs in storage or use areas. For additional recommendations, consult Compressed Gas Association Pamphlet P-1.

Never carry a compressed gas cylinder or a container of a gas in cryogenic liquid form in an enclosed space such as a car trunk, van or station wagon. A leak can result in a fire, explosion, asphyxiation or a toxic exposure.

8. Exposure Controls, Personal Protection

EXPOSURE LIMITS¹:

INGREDIENT	% VOLUME	PEL-OSHA ²	TLV-ACGIH ³	LD ₅₀ or IC ₅₀ Route/Species
Isobutane FORMULA: C ₄ H ₁₀ CAS: 75-28-5 RTECS #: Not in RTECS	99.0 to 99.9	Simple Asphyxiant	Simple Asphyxiant	Not Available

¹ Refer to individual state of provincial regulations, as applicable, for limits which may be more stringent than those listed here.

ENGINEERING CONTROLS:

Use local exhaust to prevent accumulation. Use general ventilation to prevent build up of flammable concentrations. May use hood with forced ventilation when handling small quantities. If product is handled routinely where the potential for leaks exists, all electrical equipment must be rated for use in potentially flammable atmospheres. Consult the National Electrical Code for details.

EYE/FACE PROTECTION:

Safety goggles or glasses.

SKIN PROTECTION:

Protective gloves made of plastic or rubber.

MSDS: G-95 **Revised:** 6/7/96

² As stated in 29 CFR 1910, Subpart Z (revised July 1, 1993)

³ As stated in the ACGIH 1994-1995 Threshold Limit Values for Chemical Substances and Physical Agents.

PRODUCT NAME: ISOBUTANE

RESPIRATORY PROTECTION:

Positive pressure air line with full-face mask and escape bottle or self-contained breathing apparatus should be available for emergency use.

OTHER/GENERAL PROTECTION:

Safety shoes, safety shower, eyewash.

9. Physical and Chemical Properties

PARAMETER	VALUE	UNITS
Physical state (gas, liquid, solid)	: Gas	
Vapor pressure at 70°F	: 45	psia
Vapor density at STP (Air = 1)	: 2.06	
Evaporation point	: Not Available	
Boiling point	: 10.9	°F
	: -11.7	°C
Freezing point	: Not Available	
	: Not Available	
pН	: Not Available	
Specific gravity	: Not Available	
Oil/water partition coefficient	: Not Available	
Solubility (H20)	: Very Slight	
Odor threshold	: Not Applicable	
Odor and appearance	: A colorless, odorless	gas

10. Stability and Reactivity

STABILITY:

Stable

CONDITIONS TO AVOID (STABILITY):

High temperatures. Product will start to decompose at 815°F (435°C).

INCOMPATIBLE MATERIALS:

Oxidizers

HAZARDOUS DECOMPOSITION PRODUCTS:

Carbon monoxide

11. Toxicological Information

Oxygen deficiency during pregnancy has produced developmental abnormalities in humans and experimental animals.

No chronic effects data given in the Registry of Toxic Effects of Chemical Substances (RTECS) or Sax, Dangerous Properties of Industrial Materials, 7th ed.

MSDS: G-95 Revised: 6/7/96 PRODUCT NAME: ISOBUTANE

12. Ecological Information

No data given.

13. Disposal Considerations

Do not attempt to dispose of residual waste or unused quantities. Return in the shipping container PROPERLY LABELED, WITH ANY VALVE OUTLET PLUGS OR CAPS SECURED AND VALVE PROTECTION CAP IN PLACE to BOC Gases or authorized distributor for proper disposal.

14. Transport Information

PARAMETER	United States DOT	Canada TDG
PROPER SHIPPING NAME:	Isobutane	Isobutane
HAZARD CLASS:	2.1	2.1
IDENTIFICATION NUMBER:	UN 1969	UN 1969
SHIPPING LABEL:	FLAMMABLE GAS	FLAMMABLE GAS

15. Regulatory Information

Isobutane is listed under the accident prevention provisions of section 112(r) of the Clean Air Act (CAA) with a threshold quantity (TQ) of 10,000 pounds.

SARA TITLE III NOTIFICATIONS AND INFORMATION

SARA TITLE III - HAZARD CLASSES:

Acute Health Hazard Fire Hazard Sudden Release of Pressure Hazard

16. Other Information

Compressed gas cylinders shall not be refilled without the express written permission of the owner. Shipment of a compressed gas cylinder which has not been filled by the owner or with his/her (written) consent is a violation of transportation regulations.

DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES:

Although reasonable care has been taken in the preparation of this document, we extend no warranties and make no representations as to the accuracy or completeness of the information contained herein, and assume no responsibility regarding the suitability of this information for the user's intended purposes or for the consequences of its use. Each individual should make a determination as to the suitability of the information for their particular purpose(s).

MSDS: G-95 Revised: 6/7/96 Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 26

January 30, 2009 EPCRA Section 311 Submission



January 30, 2009

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7007 0710 0000 4544 4540

Calvert County Emergency Management 175 Main Street Prince Frederick, MD 20678

RE: Dominion Cove Point LNG, LP; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for designated hazardous chemical products stored or used at the Cove Point LNG facility. Last year, we replaced the natural gas odorant system. We are now using a new chemical odorant called SPOTLEAK 1039, consisting of tert-Butylmercaptan (CAS #75-66-1) and Tetrahydrothiophene (CAS #110-01-0). A 16-part MSDS sheet for this product is enclosed.

If you have any questions or need additional information, please call contact Jim Levin, the environmental engineer at Cove Point, at (410) 286-5136.

Sincerely,

Mark D. Reaser

MDRiss

Director, Gas Environmental Services

Enclosure



January 30, 2009

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7007 0710 0000 4544 4557

Solomons VFD and Rescue 13150 HG Trueman Solomons, Maryland 20688

RE: Dominion Cove Point LNG, LP; New Hazardous Chemical Product in Use

Dear Sir or Madam:

Federal regulations (40 CFR Part 370, Section 21) require that we provide you with a material safety data sheet (MSDS) for designated hazardous chemical products stored or used at the Cove Point LNG facility. Last year, we replaced the natural gas odorant system. We are now using a new chemical odorant called SPOTLEAK 1039, consisting of tert-Butylmercaptan (CAS #75-66-1) and Tetrahydrothiophene (CAS #110-01-0). A 16-part MSDS sheet for this product is enclosed.

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Sincerely,

Mark D. Reaser

Mollessy

Director, Gas Environmental Services

Enclosure



January 30, 2009

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7007 0710 0000 4544 4533

MDE-TARSA Community Right-to-Know Section 1800 Washington Boulevard, Suite 540 Baltimore, MD 21230-1718

RE: Dominion Cove Point LNG, LP; New Hazardous Chemical Product in Use

Dear Sir or Madam:

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Sincerely,

Mark D. Reaser

MDReasu

Director, Gas Environmental Services

Enclosure

SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Calvert County Emergency Man 175 Main Street Prince Frederick, MD 20678	A. Signature A. Signature Addressee B. Received by Printed Name D. Is delivery address different from item 1? Yes If YES, enter delivery address below:
	3. Service Type
2. Article Number	4. Restricted Delivery? (Extra Fee) ☐ Yes
(Transfer from service label) PS Form 3811, February 2004 Domestic Ret	20 0000 (0), ,0,0



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Search Results

Label/Receipt Number: 7007 0710 0000 4544 4557 Status: Delivered

Your item was delivered at 2:19 PM on February 6, 2009 in SOLOMONS, MD 20688.

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse 	A. Signature X/Juliumh Di Addressee
so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	B. Received by (Printed Name) C. Date of Delivery
Article Addressed to:	D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No
Solomons VFD and Rescue	PO BOX 189
13150 HGTrueman Rd.	Solomons Mo 20688
Solomons, MD 20686	
30,0,10	3. Service Type
	Certified Mail
	☐ Registered ☐ Return Receipt for Merchandise
	☐ Insured Mail ☐ C.O.D.

2. Article Number (Transfer from service label)

7007 0710 0000 4544 4557

4. Restricted Delivery? (Extra Fee)

☐ Yes



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Dominion Cove Point LNG, LP CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report Case No. 03-MD-2013-021

ATTACHMENT 27

September 22, 2011 EPCRA Section 311 Submission



September 22, 2011

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7011 1570 0001 3077 0190

Maryland Department of the Environment Community Right-To-Know Section 1800 Washington Blvd. Baltimore, MD 21230

RE: Dominion Cove Point LNG, LP; EPCRA Sec. 311 New Chemical Notification

Dear Sir or Madam:

Enclosed are Material Safety Data Sheets for the following new chemicals/substances stored onsite at Cove Point in quantities greater than the Threshold Planning Quantity:

- 1. Safer than Salt icc melt TPQ 10,000 pounds
- 2. Sand, gravel or sand & gravel TPQ 10,000 pounds
- 3. Isopentane TPQ 10,000 pounds
- 4. Ethane TPQ 10,000 pounds
- 5. Crushed limestone TPQ 10,000 pounds

Also enclosed are the EPCRA Section 311 Report Summary, a site diagram identifying the current locations of these new materials and a Document Certification Form.

If you have any questions or need additional information, please call Jim Levin, the environmental engineer assigned to this facility, at (410) 286-5136.

Sincerely.

William H. Wilkinson, Jr. Manager - Environmental

Enclosures (8)

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Baltimore, MD 21230

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☐ Insured Mail

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☐ Yes

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Baltimore, MD 21230

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밁 **205** 570 Dominion Resources Services, Inc. 5000 Dominion Boulevard, Glen Allen, VA 23060 Web Address; www.dom.com



September 22, 2011

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7011 1570 0001 3077 0206

Mr. J. Robert Fenwick, Director Calvert County LEPC c/o Calvert County Emergency Management Division 175 Main Street, Courthouse Prince Frederick, Maryland 20678

RE: Dominion Cove Point LNG, LP; EPCRA Sec. 311 New Chemical Notification

Dear Mr. Fenwick:

Enclosed are Material Safety Data Sheets for the following new chemicals/substances stored onsite at Cove Point in quantities greater than the Threshold Planning Quantity:

1. Safer than Salt ice melt - TPQ 10,000 pounds

- 2. Sand, gravel or sand & gravel TPQ 10,000 pounds
- 3. Isopentane TPQ 10,000 pounds
- 4. Ethane TPQ 10,000 pounds
- 5. Crushed limestone TPQ 10,000 pounds

Also enclosed are the EPCRA Section 311 Report Summary, a site diagram identifying the current locations of these new materials and a Document Certification Form.

If you have any questions or need additional information, please call Jim Levin, the environmental engineer assigned to this facility, at (410) 286-5136.

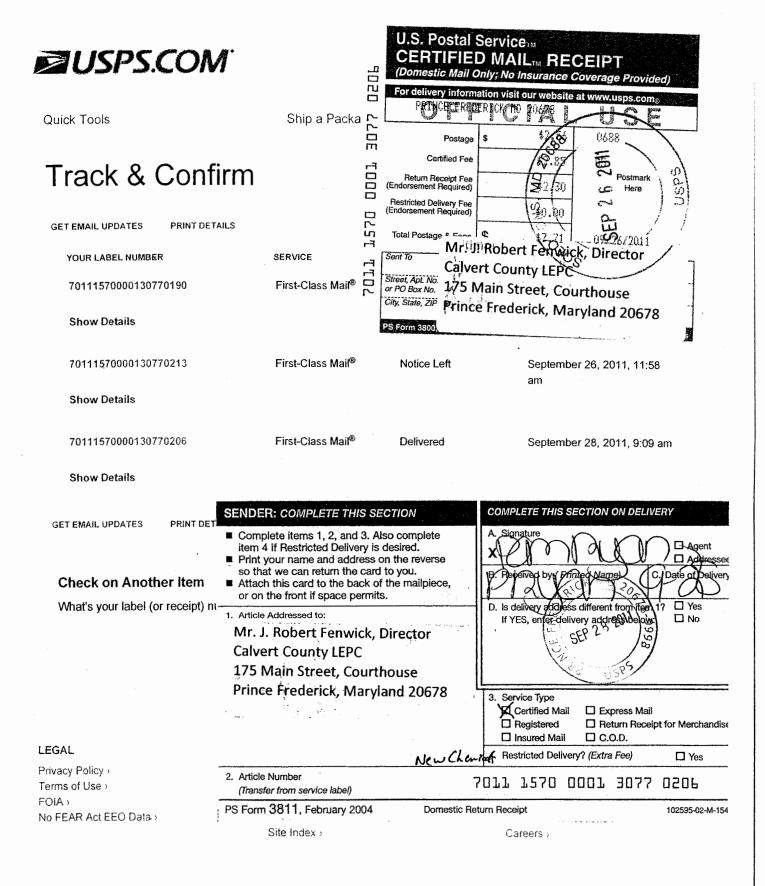
Sincerely

William H. Wilkinson, Jr. Manager - Environmental

Enclosures (8)

Customer Service

USPS Mobile





Dominion Resources Services, Inc. 5000 Dominion Boulevard, Glen Allen, VA 23060 Web Address: www.dom.com

September 22, 2011

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7011 1570 0001 3077 0213

Solomons Volunteer Rescue Squad and Fire Department P.O. Box 189
Solomons, Maryland 20688

RE: Dominion Cove Point LNG, LP; EPCRA Sec. 311 New Chemical Notification

Dear Sir or Madam:

Enclosed are Material Safety Data Sheets for the following new chemicals/substances stored onsite at Cove Point in quantities greater than the Threshold Planning Quantity:

. Safer than Salt ice melt - TPQ 10,000 pounds

2. Sand, gravel or sand & gravel - TPQ 10,000 pounds

3. Isopentane - TPQ 10,000 pounds

4. Ethane - TPQ 10,000 pounds

5. Crushed limestone - TPQ 10,000 pounds

Also enclosed are the EPCRA Section 311 Report Summary, a site diagram identifying the current locations of these new materials and a Document Certification Form.

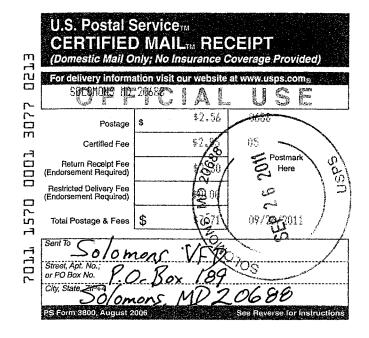
If you have any questions or need additional information, please call Jim Levin, the environmental engineer assigned to this facility, at (410) 286-5136.

Singerely,

William H. Wilkinson, Jr. Manager - Environmental

Enclosures (8)

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1. Article Addressed to:	11	□ Yés Œ No
Solomons Volunteer Rescue Squad and Fire Department	d	:
P.O. Box 189 Solomons, Maryland 20688	3. Service Type ★ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for ☐ Insured Mail ☐ C.O.D.	Merchandise
New Chem	4. Restricted Delivery? (Extra Fee)	☐ Yes
2. Article Number (Transfer from service label)	ll 1570 0001 3077 0213	
PS Form 3811, February 2004 Domes	stic Return Receipt 102	2595-02-M-1540



111 REPORTING

Page 1 of 1			
Name of facility: Dominion Cove Point LNG, LLP		ID # 4304 Date: (<i>month</i> , <i>day</i> , <i>year</i>) Sepember 20, 2011	
Street Address (no P.O. boxes, please): 2100 Cove Point Rd.			
City: Lusby	County: Calvert	ZIP code: 20657-4614	
Email: James.e.levin@DOM.com	Please list the components (that require reporting) of mixtures as separate chemicals. Make additional copies of this form as needed in order to list all chemicals necessary.		
Chemical Name	Type of chemical	Physical and Health Hazards	
Sand, gravel and or sand& gravel	☐ EHS	Check all that apply	
	☐ CERCLA	☐ Fire ☐ Sudden Release of ☐ Reactivity	
CAS#	× OTHER	X Immediate (acute) X Delayed (chronic)	
Safer than Salt - ice melt	EHS .	Check all that apply	
	☐ CERCLA	☐ Fire ☐ Sudden Release of ☐ Reactivity	
CAS#	X OTHER	X Immediate (acute) X Delayed (chronic)	
Crushed limestone	☐ EHS	Check all that apply	
	☐ CERCLA	Fire Sudden Release of Reactivity	
CAS#	× OTHER	X Immediate (acute) X Delayed (chronic)	
Isopentane	☐ EHS	Check all that apply	
	☐ CERCLA	X Fire Sudden Release of Reactivity	
CAS#	× OTHER	X Immediate (acute) X Delayed (chronic)	
Ethane	☐ EHS	Check all that apply	
	☐ CERCLA	X Fire X Sudden Release of Reactivity	
CAS#	X OTHER	X Immediate (acute) X Delayed (chronic)	
	☐ EHS	Check all that apply	
	CERCLA	☐ Fire ☐ Sudden Release of ☐ Reactivity	
CAS#	☐ OTHER	☐ Immediate (acute) ☐ Delayed (chronic)	

